

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Monaco Coach Corporation
1205 East Lincoln Street
Nappanee, Indiana 46550**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-6116-00087	
Issued by: Original Signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 26, 2002 Expiration Date: June 26, 2002

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary recreational vehicle manufacturing plant, that operates woodworking, surface coating, and fiberglass processes.

Responsible Official: Vice President
Source Address: 1205 East Lincoln Street, Nappanee, Indiana, 46550
Mailing Address: P.O. Box 465, Wakarusa, Indiana, 46573
SIC Codes: 2434, 2431, 2511, 3083, 3716, 3792
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Surface Coating:

- (1) Five (5) paint booths, located in Plant 48, identified as B48-1 through B48-5, constructed in 1984, equipped with five (5) HVLP spray guns for wood furniture and cabinet coating, with a maximum capacity at each spray booth of five (5) gallons per hour of coating, using dry filters for overspray control, and exhausting at stacks SV48-01 for booth B48-1, SV48-02 for B48-2, SV48-03 for B48-3, SV48-04 for B48-4, and SV48-05 for B48-5.
- (2) One (1) wood finishing paint line, located in Plant 48, consisting of the following equipment:
 - (A) One (1) wood prep and clean-up area with a total maximum raw material throughput of 120 units per hour per booth; and
 - (B) Three (3) paint booths, identified as B48-6 through B48-8, constructed in 1999, equipped with three (3) HVLP guns for stain, topcoat and sealer applications, with a total maximum raw material throughput of 120 units per hour per booth, using dry filters for overspray control, and exhausting at stacks SV48-6, SV48-7 and SV48-8, respectively.
- (3) One (1) lamination spray adhesive booth, located in Plant 42, identified as lam42, using one (1) HVLP spray gun, with a maximum capacity of 14 gallons per day of adhesive, using dry filters for overspray control, and exhausting at GV42.

(b) Woodworking Operations controlled by:

- (1) One (1) baghouse for particulate control, located in Plant 48, identified as D48-01, with a maximum capacity of 10000 pounds per hour, and exhausting at stack D48-01.
- (2) One (1) cyclone for particulate control, located in Plant 48, identified as D48-02, with a maximum capacity of 2000 pounds per hour, and exhausting at stack D48-02.
- (3) One (1) cyclone for particulate control, located in Plant 42, identified as D42-01, with a

maximum capacity of 2000 pounds per hour, and exhausting at stack D42-01.

(c) Fiberglass Operations:

- (1) One (1) fiberglass motor home parts manufacturing line, consisting of one (1) air assisted airless gel coat application system, one (1) air assisted airless resin application system and one (1) flow coat resin application system, with dry filters for overspray and exhausting to stack GV42.
- (2) One (1) fiberglass prep and clean-up area, exhausting to stack GV42.
- (3) One (1) sander, with dry filters for PM control, exhausting to stack GV42.
- (4) Two (2) routers, each with dry filters for PM control, and both exhausting to stack GV42.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment, identified as W43 and T43, located in Plant 43, related to manufacturing activities not resulting in the emissions of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) Degreasing operations, located in Plant 43, identified as DG43, using mineral spirits as solvent, with a maximum throughput of 0.3 gallons per day, and exhausting at stack GV43.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

- (1) Enforcement action;

- (2) Permit termination, revocation and reissuance, or modification; or
- (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining compliance of the source, currently and over the reporting

period consistent with 326 IAC 2-7-5(3); and

- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or

standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (e) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information

collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The entire source shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

Testing Requirements [326 IAC 2-7-6(1)]

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.13 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times

and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.14 Monitoring Methods [326 IAC 3][40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that will be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C -Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6] [326 IAC 2-7-19 (e)]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate estimated actual emissions of criteria pollutants from the source;
- (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location, or the Wakarusa location, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its

equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Facility Description [326 IAC 2-7-5(15)]: Surface Coating

- (1) Five (5) paint booths, located in Plant 48, identified as B48-1 through B48-5, constructed in 1984, equipped with five (5) HVLP spray guns for wood furniture and cabinet coating, with a maximum capacity at each spray booth of five (5) gallons per hour of coating, using dry filters for overspray control, and exhausting at stacks SV48-01 for booth B48-1, SV48-02 for B48-2, SV48-03 for B48-3, SV48-04 for B48-4, and SV48-05 for B48-5.
- (2) One (1) wood finishing paint line, located in Plant 48, consisting of the following equipment:
 - (A) One (1) wood prep and clean-up area with a total maximum raw material throughput of 120 units per hour per booth; and
 - (B) Three (3) paint booths, identified as B48-6 through B48-8, to be constructed in 1999, equipped with three (3) HVLP guns for stain, topcoat and sealer applications, with a total maximum raw material throughput of 120 units per hour per booth, using dry filters for overspray control, and exhausting at stacks SV48-6, SV48-7 and SV48-8, respectively.
- (3) One (1) lamination spray adhesive booth, located in Plant 42, identified as lam42, using one (1) HVLP spray gun, with a maximum capacity of 14 gallons per day of adhesive, using dry filters for overspray control, and exhausting at GV42.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The entire source shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.
- (b) Previously, the usage of paint booths B48-1 through B48-5 (pursuant to PC (20) 1730, issued February 21, 1989) were limited to less than 8.3 tons per month of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit was required to limit the potential to emit of VOC to less than 99.6 tons per 12 consecutive month period so that compliance with this limit made 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. This limit is no longer necessary because the source is able to operate these facilities under part (a) of this condition.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), for B48-1 through B48-5, and lam42, pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8, the surface coatings applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, and pursuant to PC (20) 1730, issued on February 21, 1989 for B48-1 through B48-

5, and pursuant to the Exemption issued on March 4, 1987, and CP 039-10442-00087, issued April 21, 1999 for B48-6 through B48-8, the PM from each of the surface coating operations, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.4 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR 63, Subpart A]

For the surface coating operations, and pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8, the provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

D.1.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

For the surface coating operations B48-1 through B48-5, and pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8:

- (a) The wood furniture coating operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998, and the date operation commenced for B48-6 through B48-8.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids as applied; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight, as applied; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
 - (2) Limit VHAP emissions contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids, as applied.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids, as applied.
 - (C) Or, as an alternative method to (A) and (B) of this part, use a control device to limit emissions to one (1.0) pound VHAP per pound solids, as applied.
 - (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids, as applied.

D.1.6 Work Practice Standards [40 CFR 63.803]

For the surface coating operations, and pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8, the owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum addresses each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

For the surface coating operations B48-1 through B48-5, and pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8, a Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.8 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1),(6)] [40 CFR 63]

For the surface coating operations B48-1 through B48-5, and pursuant to CP 039-10442-00087, issued April 24, 1999, for B48-6 through B48-8:

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.
- (b) IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Conditions D.1.1, D.1.3, and D.1.5 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.9 Volatile Organic Compounds (VOC)

For the surface coating operations B48-1 through B48-5, and pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8, compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.10 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.11 Particulate Matter (PM)

Pursuant to CP 039-10442-00087, issued April 21, 1999, the dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when booths B48-6 through B48-8, are in operation.

D.1.12 Monitoring

- (a) For the surface coating operations, B48-6 through B48-8, the Permittee shall implement an operator-

training program.

- (1) All operators that perform painting operations or booth maintenance, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and troubleshooting practices.
 - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.13 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when booths B48-1 through B48-5, and lam42 are in operation.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.14 Record Keeping Requirements

For the surface coating operations B48-1 through B48-5, and pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8:

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The volume weighted VOC content of the coatings used for each month;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.5.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.

- (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.1.6, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (d) To document compliance with Conditions D.1.11 and D.1.13, the Permittee shall maintain records of any non-routine maintenance activities performed on particulate emission control devices which have air flows greater than four thousand (4,000) cfm.
- (e) To document compliance with Condition D.1.12, the training program shall be written and retained on site. A log of the training program, the list of trained operators and training records, and additional inspections prescribed by the Preventive Maintenance Plan shall be maintained on site or available within one (1) hour for inspection by IDEM.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.15 Reporting Requirements

For the surface coating operations B48-1 through B48-5, and pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8:

- (a) A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.5 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.
- (c) Pursuant to the schedule required by 40 CFR 63.807(c)(2), subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.
- (d) The reports required in (b) and (c) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.2

FACILITY OPERATION CONDITIONS

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Facility Description [326 IAC 2-7-5(15)]: Woodworking Operations controlled by:

- (a) One (1) baghouse for particulate control, located in Plant 48, identified as D48-01, with a maximum capacity of 10000 pounds per hour, and exhausting at stack D48-01.
- (b) One (1) cyclone for particulate control, located in Plant 48, identified as D48-02, with a maximum capacity of 2000 pounds per hour, and exhausting at stack D48-02.
- (c) One (1) cyclone for particulate control, located in Plant 42, identified as D42-01, with a maximum capacity of 2000 pounds per hour, and exhausting at stack D42-01.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 12.05 pounds per hour for D48-01, and 4.10 pounds per hour each for D48-02 and D42-01, when operating at a process weight rate of 10,000 pounds per hour for D48-01, and 2000 pounds per hour for D48-02 and D42-01, respectively. The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.4 Particulate Matter (PM)

- (a) Pursuant to PC (20) 1730, issued on February 21, 1989;
 - (1) The baghouse and cyclone, D48-01 and D48-02, for PM control shall be in operation at all times when the woodworking facilities are in operation; and
 - (2) The visible emissions from the baghouse and cyclone, D48-01 and D48-02, for PM control shall not exceed 10% opacity.
- (b) Cyclone D42-01, for PM control, shall be in operation at all times when the woodworking facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouse and cyclone stack exhaust (D48-01 and 02, and D42-01) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.6 Particulate Control Equipment Inspections

- (a) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (b) An inspection shall be performed each calendar quarter of the cyclones controlling the woodworking operation when venting to the atmosphere. Cyclone inspections shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors.

D.2.7 Broken or Failed Bag Detection or Cyclone Failure Detection

- (a) In the event that bag failure has been observed for the baghouse when venting to the atmosphere:
 - (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the woodworking stacks' exhaust when venting to the atmosphere.

- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Facility Description [326 IAC 2-7-5(15)]: Fiberglass Operations:

- (a) One (1) fiberglass motor home parts manufacturing line, consisting of one (1) air assisted airless gel coat application system, one (1) air assisted airless resin application system and one (1) flow coat resin application system, with dry filters for overspray and exhausting to stack GV42.
- (b) One (1) fiberglass prep and clean-up area, exhausting to stack GV42.
- (c) One (1) sander, with dry filters for PM control, exhausting to stack GV42.
- (d) Two (2) routers, each with dry filters for PM control, and both exhausting to stack GV42.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to CP 039-10299-00087, issued February 5, 1999, and 326 IAC 6-3 (Process Operations):

- (a) The fiberglass panel manufacturing line shall have a PM allowable emission using the following equation:

$$E = 4.10 P^{0.67}$$

Where: E = rate of emissions in pounds hour
P = Process weight rate in tons per hour.

- (b) The two (2) routers and one (1) sander have a process weight rate of 75 pounds per hour each and are not already regulated by 326 IAC 6-1 or any New Source Performance Standard, therefore the allowable PM emissions shall not exceed 0.551 pounds per hour each.

D.3.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

Pursuant to CP 039-10299-00087, issued February 5, 1999, the VOC content of the gel coats and resins delivered to the applicator of the fiberglass operation shall be limited such that the potential emissions of VOC shall be less than twenty-five (25) tons per twelve (12) consecutive months, rolled on a monthly basis. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

D.3.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-1-4.4]

Pursuant to CP 039-10299-00087, issued February 5, 1999, the HAP content of the gel coats and resins delivered to the applicator of the fiberglass operation shall be limited such that the potential emissions of HAPs shall be limited such that the potential to emit (PTE) of a single HAP shall be less than ten (10) tons per twelve (12) consecutive months and a combination of HAPs shall be less than twenty-five (25) tons per twelve (12) consecutive months, each rolled on a monthly basis. Therefore, 326 IAC 2-1-4.4, New Source Toxics Control, does not apply.

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.5 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Conditions D.3.1, D.3.2, and D.3.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.3.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.7 VOC Emissions (VOC)

Pursuant to CP 039-10299-00087, issued February 5, 1999, compliance with the limit in Condition D.3.2, shall be determined based upon the following criteria:

- (a) Monthly usage by weight, monomer content and method of application for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, multiplying the other material usage rates by the percent VOC and summing those emissions for all gel coats, resins and all other VOC containing materials. Emission factors shall be obtained from the reference approved by IDEM, OAQ (specified below).
- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Models for Open Molding of Composites", Composites Fabricators Association, April, 1999.

D.3.8 HAP Emissions (HAP)

Pursuant to CP 039-10299-00087, issued February 5, 1999, compliance with the limit in Condition D.3.3, shall be determined based upon the following criteria:

- (a) Monthly usage by weight, monomer content and method of application for each gel coat and resin shall be recorded. HAPs' emissions shall be calculated by multiplying the HAPs' usage of each gel coat and resin by the emission factor that is appropriate for the monomer content and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ (specified below).
- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Models for Open Molding of Composites", Composites Fabricators Association, April, 1999.

D.3.9 Particulate Matter (PM)

Pursuant to CP 039-10299-00087, issued February 5, 1999, the dry filters for particulate matter overspray shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the fiberglass manufacturing line, including the sander and routers, is in operation.

D.3.10 Monitoring

- (a) Pursuant to CP 039-10299-00087, issued February 5, 1999:
 - (1) All operators that perform spray-up or gelcoat operations or booth maintenance, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and troubleshooting practices.
 - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.11 Record Keeping Requirements

Pursuant to CP 039-10299-00087, issued February 5, 1999:

- (a) To document compliance with Conditions D.3.2 and D.3.3, the Permitted shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs' emission limits established in Condition D.3.2 and D.3.3.
 - (1) The amount of each resin and gel coat used. The VOC and mass weighted monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The volume weighted VOC content of the coatings used for each month;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month;
 - (5) The weight of VOCs emitted for each compliance period;
 - (6) The total HAP usage for each month; and
 - (7) Method of application and other emission reduction techniques for each resin and gel coat use for each month.
- (b) To document compliance with Condition D.3.9, the Permittee shall maintain records of any non-routine maintenance activities performed on particulate emission control devices which have air flows greater than four thousand (4,000) cfm.
- (c) To document compliance with Condition D.3.10, the training program shall be written and retained on site. A log of the training program, the list of trained operators and training records, and additional inspections prescribed by the Preventive Maintenance Plan shall be maintained on site or available within one (1) hour for inspection by IDEM.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.12 Reporting Requirements

Pursuant to CP 039-10299-00087, issued February 5, 1999, a quarterly summary of the information to document compliance with Conditions D.3.2 and D.3.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.4

FACILITY OPERATION CONDITIONS

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Facility Description [326 IAC 2-7-5(15)] and Insignificant Activity [326 IAC 2-7-1(21)]:

- (a) The following equipment, identified as W43 and T43, located in Plant 43, related to manufacturing activities not resulting in the emissions of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) Degreasing operations, located in Plant 43, identified as DG43, using mineral spirits as solvent, with a maximum throughput of 0.3 gallons per day, and exhausting at stack GV43.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from facilities W43 and T43 shall not exceed allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.4.2 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operating requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Compliance Determination Requirement

D.4.3 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Monaco Coach Corporation
Source Address: 1205 East Lincoln Street, Indiana 46550
Mailing Address: P.O. Box 465, Wakarusa, Indiana 46573
Part 70 Permit No.: T039-6116-00087

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Monaco Coach Corporation
Source Address: 1205 East Lincoln Street, Indiana 46550
Mailing Address: P.O. Box 465, Wakarusa, Indiana 46573
Part 70 Permit No.: T039-6116-00087

This form consists of 2 pages

Page 1 of 2

- | | |
|---|--|
| 9 | This is an emergency as defined in 326 IAC 2-7-1(12) |
| C | The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and |
| C | The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16. |

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
Semi-Annual Report
VOC and VHAP usage - Wood Furniture NESHAP**

Source Name: Monaco Coach Corporation
Source Address: 1205 East Lincoln Street, Indiana 46550
Mailing Address: P.O. Box 465, Wakarusa, Indiana 46573
Part 70 Permit No.: T039-6116-00087
Facility: Surface Coating Operations
Parameter: VOC and VHAPs - NESHAP
Limit: (1) Finishing operations -1.0 lb VHAP/lb Solids
(2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
(3) All other thinner mixtures - 10% VHAP content by weight
(4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids
(5) All other contact adhesives - 1.0 lb VHAP/lb Solids
(6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: _____

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

9 No deviation occurred in this six month period.

9 Deviation/s occurred in this six month period.
Deviation has been reported on:

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Monaco Coach Corporation
Source Address: 1205 East Lincoln Street, Indiana 46550
Mailing Address: P.O. Box 465, Wakarusa, Indiana 46573
Part 70 Permit No.: T039-6116-00087
Facility: Fiberglass Operations
Parameters: VOC emissions (includes volatile organic HAP from resins and gel coats), single HAP and combination HAP PTE
Limits: Less than 25 tons VOC per twelve month period
Less than 10 tons HAPs per twelve month period for a single HAP
Less than 25 tons HAPs per twelve month period for a combination HAPs
During first twelve months of operation: single HAP less than 0.833 tons per month, and a combination of less than 2.08 tons per month

YEAR: _____

Month	Pollutant	Emissions (tons/month)	Emissions for previous twelve month period (tons)
	VOC		
	HAP		
	VOC		
	HAP		
	VOC		
	HAP		

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Monaco Coach Corporation
Source Address: 1205 East Lincoln Street, Indiana 46550
Mailing Address: P.O. Box 465, Wakarusa, Indiana 46573
Part 70 Permit No.: T039-6116-00087
Facility: Surface Coating and Fiberglass operations
Parameter: VOC emissions
Limit: 250 tons per 12 consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Monaco Coach Corporation
Source Address: 1205 East Lincoln Street, Indiana 46550
Mailing Address: P.O. Box 465, Wakarusa, Indiana 46573
Part 70 Permit No.: T039-6116-00087

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: **Monaco Coach Corporation**
 Source Location: **1205 Lincoln Street, Nappanee, Indiana 46550**
 County: **Elkhart**
 Operating Permit No.: **039-6116-00087**
 SIC Code: **2434, 2431, 2511, 3083, 3716, 3792**
 Permit Reviewer: **Melissa Groch**

On October 30, 1999, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Monaco Coach Corporation had applied for a Part 70 Operating Permit for a stationary recreational vehicle manufacturing plant, that operates woodworking, surface coating, and fiberglass processes. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 15, 1999, Monaco Coach Corporation submitted comments on the proposed Part 70 Operating Permit. Since these comments have been made, the OAM has changed its name from Air Management to Air Quality, or OAQ. Because of the numerous references to these terms in the permit conditions, each change has not been documented below unless other necessary revisions are being made to the same condition or condition part. The summary of the comments and corresponding responses is as follows (strikeout indicates deleted language, and new language is bolded):

Comment 1:

Paragraph A.1, page 5 of 45: Responsible Official should be changed to "Richard E. Bond".

Response to Comment 1:

The IDEM agrees. However, so that the source does not have to make numerous amendments in the future for name changes, the title of the responsible official is only required. Therefore, Condition A.1, General Information, has a change to the first line as follows:

Responsible Official: ~~Jim Sheldon~~ **Vice President**

Comment 2:

Paragraph A.2.(c)(1), page 6 of 45: The notation that refers to "with dry filters for overspray and" should be removed. This is a minor source and complies with all regulations with out controls.

Response to Comment 2:

The first paragraph of Section A explains clearly that the information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. Therefore, if an emissions unit listed in condition A.2, Emission Units and Pollution Control Equipment Summary, has dry filters for overspray, then the description should accurately state this, and if the dry filters are necessary to comply, it will be clearly indicated in the permit.

Comment 3:

Paragraph A.2.(c)(3), page 6 of 45: The notation that states "controlled by dry filters" should be removed. This is a minor source and complies with all regulations with out controls.

Response to Comment 3:

To lessen confusion regarding this description, Condition A.2, Emission Units and Pollution Control Equipment

Summary, part (c)(3), has been modified to read as:

One (1) sander, ~~controlled by~~ **with** dry filters **for PM control**, exhausting to stack GV42.

In addition to this change, please note that Condition D.3.9, Particulate Matter, states that when the fiberglass manufacturing line is in operation, the dry filters for particulate matter overspray shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times. This condition includes the equipment above, and to clarify this further, D.3.9 has been revised to read as:

Pursuant to CP 039-10299-00087, issued February 5, 1999, the dry filters for particulate matter overspray shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the fiberglass manufacturing line, **including the sander and routers**, is in operation.

Comment 4

Paragraph A.2.(c)(4), page 6 of 45: The notation that states "controlled by dry filters" should be removed. This is a minor source and complies with all regulations without controls.

Response to Comment 4:

Please see the Responses to Comments 2 and 3. As a result, (c)(4) has been modified to read as:

Two (2) routers, ~~controlled by~~ **each with** dry filters **for PM control**, ~~with and~~ both exhausting to stack GV42.

Comments 5 and 6

Paragraph B.11(a), page 8 of 45: Paragraph B.11(a) should be modified to require compliance only for federally enforceable terms or conditions. The first sentence of the paragraph should be revised to include the phrase "federally enforceable" between the phrases "the source's compliance with the" and "terms and conditions contained". 326 IAC 2-7-5(1)(G) requires that every Title V permit designate whether a requirement is state or federally enforceable. Further, Part 70 only requires the certification of federally enforceable requirements. Because Indiana distinguishes between state and federal requirements, the permit should limit the certification to federally enforceable requirements.

Paragraph B.11(c)(5), page 9 of 45: Paragraph B.11(c)(5) should be deleted because it is not one of the items specified in 329 IAC 2-7-6(5)(C). Further, the Technical Support Document does not provide any basis upon which to determine that this information is necessary to determine the source's compliance status.

Response to Comments 5 and 6

Rule 326 IAC 2-7-6, Compliance Requirements, states that each Part 70 permit issued under this rule shall contain the specific requirements listed in this rule section with respect to compliance. It does not specify "federally enforceable" when referring to the terms and conditions of the permit. The original part (5) language of this condition has been deleted. Other minor changes have been made to this condition for further clarity. The condition, Annual Compliance Certification, now reads as:

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The **initial** certification shall cover the time period from ~~January 1 to the date of final permit issuance~~ **through** December 31 of the ~~previous same~~ year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance ~~Branch Data Section~~, Office of Air ~~Management~~ **Quality**
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, ~~ΘAM~~ **OAQ**, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The **appropriate** identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was ~~based on~~ continuous or intermittent ~~data~~;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); **and**
 - (5) ~~Any insignificant activity that has been added without a permit revision; and~~
 - (~~6~~) Such other facts, as specified in Sections D of this permit, as IDEM, ~~ΘAM~~ **OAQ**, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Also, as a result of the Response to Comment 9, condition B.11 has been changed to B.10.

Comment 7

Paragraph B.12(b), page 9 of 45: Paragraph (b) should be revised to delete the phrase “failure to implement the Preventive Maintenance Plan” located between the phrases “as necessary to ensure that” and “does not cause or contribute to” and replace it with the phrase “the facility”. This revision is necessary to more accurately reflect the requirements of the cited regulations.

Response to Comment 7

Condition B.12, Preventive Maintenance Plan, part (b), simply explains that the Preventive Maintenance Plans shall be implemented so that a violation does not occur as a result of not instituting the plan. This meaning would be completely lost by using the wording as suggested above in Comment 7. See the Response to Comment 8. Also, as a result of the Response to Comment 9, condition B.12 has been changed to B.11.

Comment 8

Paragraph B.12(c), page 9 of 45: The second sentence in paragraph B.12(c) should be deleted in its entirety. The sentence as proposed by IDEM is beyond the requirements of 326 IAC 1-6-3.

Response to Comment 8

As listed in 326 IAC 2-7-4(c)(9)(A), the application must contain confirmation that the source maintain PMPs as described in 326 IAC 1-6-3. In cases where a source’s PMP may be insufficient, IDEM, OAQ had added language to subsection (c) to establish a protocol for correcting deficient PMPs. The basis for this is found in 326 IAC 1-6-3(b), wherein PMPs may be subject to approval by the Commissioner. Therefore, the second sentence of part (c) for this condition is not beyond the requirements of 326 IAC 1-6-3. Along with minor grammatical changes, and for further clarity several parts have language added or deleted. These parts now read as:

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; **and**

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond ~~its~~ **the Permittee's** control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the ~~Preventive Maintenance Plans~~ **PMPs** as necessary to ensure that failure to implement the ~~Preventive Maintenance Plan~~ **a PMP** does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) **A copy of the PMPs** shall be submitted to IDEM, ~~OAM~~ **OAQ**, upon request and **within a reasonable time, and** shall be subject to review and approval by IDEM, ~~OAM~~ **OAQ**. IDEM, ~~OAM~~ **OAQ**, may require the Permittee to revise its ~~Preventive Maintenance Plans~~ **PMPs** whenever lack of proper maintenance causes or contributes to any violation. **The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (d) **Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

Also, as a result of the response to comment 9 below, B.12 has been changed to B.11.

Comment 9

Paragraph B.14(c), page 11 of 45: The first sentence in paragraph B.14(c) should be revised to delete the phrase "including any term or condition from a previously issued construction or operation permit" located between the phrases "that applied to the source on the date of permit issuance" and "IDEM, OAM, shall immediately take steps to reopen". This revision is necessary because the terms and conditions in previously issued construction or operation permits are superseded by this permit.

Response to Comment 9

The IDEM agrees to the deletion of this phrase in condition B.14, now listed as B.13. Also, since this permit draft was on public notice, the condition's title line, and parts (a), (b), (c) and (h) have also been revised. The title line has the following rule cites added:

B.14 3 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

Part (a) has been rewritten to read as:

- (a) ~~This condition provides a permit shield as addressed in 326 IAC 2-7-15.~~ **Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.**

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

And part (b) has been deleted because of a new condition added to the permit, as discussed at the end of this document in item 8. It read as:

- ~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previous issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:~~
- ~~(1) The applicable requirements are included and specifically identified in this permit; or~~
- ~~(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~

The first sentence of part (c), now listed as part (b) due to the change above, has been revised to read as:

If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, ~~including any term or condition from a previously issued construction or operation permit~~, IDEM, OAM Q, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

A rule cite typo in part (h), now part (g), has also been corrected from [326 IAC 2-7-12(b)(7)] to [326 IAC 2-7-12(b)(8)].

Also, because part (a) above now incorporates condition B.1, Permit No Defense, this condition has been deleted from the permit changing the numbering of all subsequent conditions. The condition read as:

B.1 Permit No Defense [IC 13]

- ~~(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.~~
- ~~(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."~~

The Table of Contents has also been changed to reflect this deletion.

Comment 10

Paragraph B.16, page 12 of 45: Paragraph B.16(a) should be modified to remove the requirement to report deviations within ten days. No regulatory authority authorizes IDEM to require deviations to be reported within ten days. Further, the last sentence of paragraph B.16(b) and all of paragraphs B.16(c) and (d) should be deleted. Therefore, paragraph B.16 should be revised to delete the phrase "within ten (10) calendar days from the date of the discovery of the deviation" from paragraph 16(a). Further, the last sentence of paragraph B.16(b) and all of paragraphs B.16(c) and (d) should be deleted.

Response to Comment 10

IDEM has reconsidered this issue and revised this condition (Deviations from Permit Requirements and Conditions), We are no longer requiring sources to report deviations in 10 days. Now sources will report deviations quarterly on the Quarterly Deviation and Compliance Monitoring Report. References to the emergency report have been removed since deviations will not be reported on that form anymore. There is no longer a 5% exception for reporting deviations, since we changed the 10 day notification to a quarterly report. Therefore, this condition now reads as:

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance ~~Branch~~ **Data Section**, Office of Air ~~Management~~ **Quality**
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

~~within ten (10) calendar days from the date of the discovery of the deviation.~~ **using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.**

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit. ~~or a rule. It does not include:~~
- (1) ~~An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
 - (2) ~~An emergency as defined in 326 IAC 2-7-1(12); or~~
 - (3) ~~Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~
 - (4) ~~Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~
- ~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~
- (c) ~~Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the “responsible official” as defined by 326 IAC 2-7-1(34). Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.~~
- (d) ~~Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.~~

A new report has also been created to better suit this condition. See the Response to Comment 65 regarding the new reporting form. Because condition B.1 has been deleted, this condition is now listed as B.15.

Comment 11

Paragraph B.18(b)(1)(B), page 13 of 45: The first sentence in paragraph B.18(b)(1)(B) is incomplete. The sentence addresses when a submission is considered timely. Therefore, the following phrase should be added to the beginning of paragraph B.18(b)(1)(B): “An application is considered timely”.

Response to Comment 11

Condition B.18 is now listed as B.17. Part (b)(1) is clearly punctuated by a colon, and therefore, no additional change is necessary. The phrases used in (b)(1)(A) and (B) complete the sentence. To amend this condition in the way the comment above suggests, would be redundant. Also, this condition is regarding permit renewal, and the suggestion above does not specifically state what type of application is considered timely. For clarity, however, the following sentence has been added to part (a) of this condition:

The renewal application does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Comment 12

Paragraph B.20(b), page 14 of 45: The citation to 326 IAC 2-7-12(b)(1)(D)(i) found in the first sentence of paragraph B.20(b) should be deleted and replaced with a reference to 326 IAC 2-7-12(b)(1). This revision is necessary to accurately reflect the reference contained in 326 IAC 2-7-12(b)(2).

Response to Comment 12

The IDEM agrees. This condition, now listed as B.19, has a deletion in part (b) which now reads as:

Notwithstanding 326 IAC 2-7-12(b)(1) ~~(D)(i)~~ and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

Comment 13

Paragraph B.21(a)(5), page 15 of 45: The citation to 326 IAC 2-7-20(b) contained in the last sentence of paragraph B.21(a)(5) should be replaced with a citation to 326 IAC 2-7-20(b)(1). This revision is necessary to accurately reflect the citation in 326 IAC 2-7-20(a)(4).

Response to Comment 13

The IDEM agrees. As the language for this condition, now listed as B.20, is taken from rule 326 IAC 2-7-20, the last sentence in part (a)(5) should also reflect this rule language for consistency. Therefore, the last sentence of part (a)(5) has been changed to read as follows:

Such records shall consist of all information required to be submitted to IDEM, ~~OPM~~ **OAQ**, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

Also in this condition, part (a)(2) has the following changes:

Any **preconstruction** approval required by 326 IAC 2- 4 **7-10.5** has been obtained;

Comment 14

Paragraph B.21(b), page 15 of 45: This paragraph should be revised to clarify the meaning of Section 502(b)(10) changes and when these revisions are allowed. The applicable regulations specify that Section 502(b)(10) changes include “changes that contravene an express Part 70 permit term.” See 326 IAC 2-7-1(36). Condition B.21 specifies that such changes can be made upon written notification. This appears to contradict the regulation and IDEM should clarify what constitutes Section 502(b)(10) changes.

Response to Comment 14

The IDEM agrees. Therefore part (b) of Operational Flexibility (now listed as B.20) has been revised as follows:

(b) **The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a).** For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, ~~the~~ the notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Also, part (e) of this condition has been deleted. It read as:

~~Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.~~

Comments 15, 16, and 17

Paragraph B.23, page 15 of 45: The introductory paragraph of B.23 should be revised to include the phrase “of the commissioner” between the phrases “or an authorized representative” and “to perform the following”. This revision is necessary to more accurately reflect the provisions contained in 326 IAC 2-7-6(2).

Paragraph B.23(d), page 16 of 45: Paragraph B.23(d) should be revised to include the following phrase at the beginning of the condition: “As authorized by the Clean Air Act,”. This revision is necessary to more accurately reflect the provisions contained in 326 IAC 2-7-6(2)(D).

Paragraph B.23(e), page 16 of 45: Paragraph B.23(e), including subparagraphs B.23(e)(1) and B.23(e)(2), should be deleted in their entirety. Paragraph B.23(e) contains requirements that are not identified in the underlying regulation, 326 IAC 2-7-6(2). Further, neither the permit nor the Technical Support Document provides any basis for the

commissioner to impose this additional condition. Finally, subparagraphs B.23(e)(1) and (2) specify the procedures the permittee must follow to claim information as confidential. At this time, IDEM is in the process of revising the confidentiality regulation. Therefore, including specific requirements in the permit could result in inconsistency between the permit and the underlying confidentiality regulation.

Response to Comments 15, 16, and 17

The IDEM agrees that this condition needs to be revised. This is best achieved by adding a rule cite in the title, and deleting a rule cite in part (e). For further clarification of the first sentence, language has been added. Also, it was determined by IDEM that parts (e)(1) and (e)(2), were unnecessary. This condition is now listed as B.22, and reads as:

B.22 2 Inspection and Entry [326 IAC 2-7-6(2)] [IC13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, ~~at reasonable times,~~ any records that must be kept under the conditions of this permit;
 - (c) Inspect, ~~at reasonable times,~~ any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
 - (d) Sample or monitor, ~~at reasonable times,~~ substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
 - (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. ~~[326 IAC 2-7-6(6)]~~
- (1) ~~The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]~~
- (2) ~~The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]~~

Comment 18

Paragraph C.2, page 17 of 45: The paragraph addresses "Particulate Matter Emission Limitations For Processes with Process Weights Less Than One Hundred (100) Pounds Per Hour". Per the definition of "Insignificant activity", the application of this rule should be for sources with a potential uncontrolled emissions of greater than 5.0 pounds per hour or 25 pounds per day. The reference to the maximum process rate of less than 100 pounds per hour, is contrary to this exemption. Paragraph C.2 should be deleted in its entirety because, by its plain terms, the process weight rule, 326 IAC 6-3-2(c), does not apply to processes with production rates less than 100 pounds per hour.

Response to Comment 18

Rule 326 IAC 6-3-2 is applicable to operations at any process weight rate, unless a process is otherwise regulated by 326 IAC 6-1. There is nothing in this rule which states otherwise. This condition specifically requires any additional processes, at any given source, whether insignificant or not, which operate at a maximum process weight rate of less than 100 pounds per hour, to comply with the stated limit regarding particulate matter emissions. As a result, this condition must remain in the final permit for this source. The Part 70 Permit program does not relieve sources from rule applicability. Therefore, there has been no change to Condition C.2, Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour.

Comment 19

Paragraph C.5, page 17 of 45: Paragraph C.5 should be deleted in its entirety because an incinerator is not located at this source. Therefore, paragraph C.5 is inapplicable.

Response to Comment 19

Condition C.5, Incineration, states, "The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2." The condition is a general prohibition against improper incineration that applies to all sources, whether the source has incinerators or not. Waste material can only be burned in equipment that meets the cited requirements. This condition will not be changed.

Comment 20

Paragraph C.9, pages 17 and 18 of 45: Paragraph C.9 should be amended to merely require compliance with the applicable regulations. Paragraph C.9 unnecessarily restates the requirements of the applicable regulations. Therefore, paragraph C.9, including all subparagraphs, should be deleted in their entirety and replaced with the following: "The Permittee shall comply with the applicable notice, emission control, training, accreditation, and inspection requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR §61.140 when conducting any asbestos abatement project covered by those rules."

Response to Comment 20

Condition C.9, Asbestos Abatement Projects, is written to outline the requirements under each applicable rule (326 IAC 14-10, 326 IAC 18, 40 CFR 61.140) so that it is more clear to the Permittee what requirements apply. Since this permit was on public notice, the OAQ has written a shorter version. The Office of Air Quality includes all applicable requirements contained in Title 326 of the Indiana Administrative Code (IAC) in the Part 70 Operating Permits. Condition C.9 Asbestos Abatement Projects is applicable to every source located in Indiana, regardless of operation or potential emissions. As a result of this comment, the previous version has been deleted entirely and replaced with the following:

Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

Comment 21

Paragraph C.10(a), pages 18 and 19 of 45: The last sentence of paragraph C.10(a) should be deleted in its entirety and replaced with the following: "The Permittee shall notify IDEM, OAM, of the actual test date at least two weeks prior to the test date." This revision is necessary because 326 IAC 3-6-2(h) only requires the permittee to notify the department - not "submit a notice".

Response to Comment 21

The IDEM agrees, and has made the following changes to Condition C.10, Performance Testing. The last sentence of part (a) has been deleted and replaced by new language as follows:

~~The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.~~ **The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

Part (b) has been replaced with new language, and its previous language is now part (c), as follows:

- (b) **The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, ~~OAM~~ **OAQ** ~~within not later than~~ **not later than** forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, ~~OAM~~ **OAQ**, if the source submits to IDEM, ~~OAM~~ **OAQ**, a reasonable written explanation ~~within not later than~~ **not later than** five (5) days prior to the end of the initial forty-five (45) day period.

The last sentence of the condition is now in part (a). It read as:

~~The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

Comment 22

Paragraph C.11, page 19 of 45: Paragraph C.11 should be modified to delete paragraph C.11(c) because it is not authorized by regulation and conflicts with the permit shield rule. IDEM should delete paragraph C.11(c) because the rules do not require Monaco to comply with requirements that become effective during the term of the permit unless the permit is modified to incorporate those new requirements. The regulations to incorporate new or different requirements requires IDEM to modify the permit and/or issue a compliance order before new requirements become effective.

Response to Comment 22

Part (a) of the Permit Shield condition (B.13) states that "This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements". Therefore, the source is required to comply with requirements that become effective during the term of this permit and if the permit is not modified to include such requirements, the source is not protected by the permit shield and maybe subject to enforcement if necessary. The Compliance Schedule condition was deleted from the Title V permit because it is an application requirement, not a permit requirement. This condition has been replaced by an entirely new condition for Compliance Requirements which reads as:

Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

The Table of Contents has also been changed.

Comment 23

Paragraph C.12, page 19 of 45: Paragraph C.12 should be revised to allow additional time to install necessary equipment. Monaco believes that it would be more appropriate to require the initial period be extended to 180 days and any extension period also be extended to 180 days.

Response to Comment 23

Ninety days is believed to be generally adequate to install any required monitoring equipment that is not already present. Note that this refers only to monitoring equipment, such as a pressure drop gauge, not to control equipment. The condition also contains a provision that, if due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days by notifying IDEM. This condition, Compliance Monitoring, has been revised as follows for clarity:

~~Compliance with applicable requirements shall be documented as required by this permit.~~ **Unless otherwise specified in this permit, A** all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. **If required by Section D, F** the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Also, to clarify requirements for new emission units added through source modifications, the following sentence has been added to the end of this condition:

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

Comment 24

Paragraph C.16, page 20 of 45: Paragraph C.16, including all subparagraphs, should be deleted in its entirety. Neither the permit nor the Technical Support Document indicate that the Risk Management Plan requirements are applicable

to this facility. Therefore, the paragraph should be deleted.

Response to Comment 24

Condition C.16, Risk Management Plan, does not state that the Permittee has more than the threshold quantity of a regulated substance. The plan must be submitted if the Permittee may meet the threshold at some time in the future. Therefore, this condition remains in the permit. It has been revised for further clarity to read as:

If a regulated substance, subject to 40 CFR 68, is present at a source in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall **submit**:

(a) ~~Submit:~~

(1) A compliance schedule for meeting the requirements of 40 CFR 68 ~~by the date provided in 40 CFR 68.10(a); or~~

(b) (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); ~~and.~~

(3) ~~A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.~~

(b) ~~Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.~~

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment 25

Paragraph C.17, page 21 of 45: Paragraph C.17 should be deleted in its entirety because it is not authorized by 326 IAC 2-7-5 or 2-7-6. Further, 326 IAC 1-6 is not applicable to the Permittee. In addition, the paragraph as proposed by IDEM fails to recognize that a compliance monitoring plan does not have to be an entirely new document. To the extent a compliance monitoring plan is necessary, the plan can reference information contained in other documents.

Response to Comment 25

The OAQ believes that responding promptly to compliance-related information is necessary to the compliance status of the source. The description of the response steps will be contained in a Compliance Response Plan (CRP) rather than integrated with the Preventive Maintenance Plan. While some sources may include it as an addendum to the PMP, having a Compliance Response Plan as an identifiable document will allow the permit to be more clear as to the regulatory responsibilities of each document. The CRP will not be described in the permit and may be revised by the Permittee without notice to the OAQ. The OAQ reserves the authority to require the submittal, or the submittal and approval, of the CRP as necessary." This condition will remain in the permit. In order to clarify matters, the IDEM has made the following changes:

Compliance Monitoring Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to **prepare** ~~implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:~~

(1) ~~This condition;~~

(2) ~~The Compliance Determination Requirements in Section D of this permit;~~

(3) ~~The Compliance Monitoring Requirements in Section D of this permit;~~

(4) ~~The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~

(5) ~~A~~ a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. ~~A CRP's shall be submitted to IDEM, OAM OAQ upon request and shall be subject to review and approval by IDEM, OAM.~~ The CRP shall be prepared within ninety (90) days after issuance of this permit by the

- Permittee, **supplemented from time to time by the Permittee**, and maintained on site, and is comprised of:
- (A)(1) **Reasonable R** response steps that will be implemented in the event that ~~compliance-related information indicates that~~ a response step is needed pursuant to the requirements of Section D of this permit; and **an expected timeframe for taking reasonable response steps.**
 - (B) ~~A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~
 - (2) **If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.**
- (b) For each compliance monitoring condition of this permit, ~~appropriate~~ **reasonable** response steps shall be taken when indicated by the provisions of that compliance monitoring condition. ~~Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable as follows:~~
- (1) **Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or**
 - (2) **If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.**
 - (3) **If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.**
 - (4) **Failure to take reasonable response steps shall constitute a violation of the permit.**
- (c) ~~After investigating the reason for the excursion the~~ The Permittee is ~~excused from taking~~ **not required to take any** further response steps for any of the following reasons:
- (1) ~~The monitoring equipment malfunctioned, giving a false reading~~ **A false reading occurs due to the malfunction of the monitoring equipment and** ~~This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.~~
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for ~~an administrative amendment~~ **a minor permit modification** to the permit, and such request has not been denied ~~or~~.
 - (3) An automatic measurement was taken when the process was not operating; ~~or~~.
 - (4) The process has already returned **or is returning** to operating within "normal" parameters and no response steps are required.
- (d) **When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B- Deviations from Permit Requirements and Conditions.**
- (d)(e) ~~Records shall be kept of all instances in which the compliance-related information was not met and of all response steps taken.~~ **The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) **Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.**

Please note that the change in part (c)(2) has been made because 326 IAC 2-7-11(a)(7) has been repealed. Also,

because of the revisions to this condition, C.20 Monitoring Data Availability is no longer necessary and has been deleted from the permit. The rest of Section C has been re-numbered to account for the deletion of C.20. This condition read as:

- (a) ~~With the exception of performance tests conducted in accordance with Section C -Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.~~
- (b) ~~As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.~~
- (c) ~~If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.~~
- (d) ~~If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.~~
- (e) ~~At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.~~
- (f) ~~Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.~~

Comment 26

Paragraph C.18, pages 21 and 22 of 45: Paragraph C.18 should be modified to allow for more flexibility. Paragraph C.18 specifies certain actions that should be taken when noncompliance is demonstrated by a stack test. However, the specific procedures set out in paragraph C.18 can interfere with the ability to make determinations on the spot and inhibit flexibility. Additionally, IDEM has no regulatory basis for requiring these conditions. Therefore, paragraph C.18 should either be deleted, or at a minimum, should be modified to include the following additional subparagraph:

- “(c) The Permittee is not required to follow the specific procedures set out in (a) and (b) above if it and IDEM, OAM, agree to a different schedule of activities to address any noncompliant situation.”

Response to Comment 26

OAQ has authority under 326 IAC 2-7-6(6) and 2-7-5 to require Condition C.18, Actions Related to Noncompliance Demonstrated by a Stack Test. The IDEM originally included this permit language to benefit the Permittee, because these provisions inform the Permittee about the notice of deficiency process. Since this Permittee has requested a modification of this condition, some wording will be stricken. Therefore, the following revisions will be made to parts (a), (b), and (c) of this condition as follows:

- (a) When the results of a stack test performed in conformance with Section C -Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, ~~OAM~~ **OAQ**, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize **excess** emissions from the affected facility while the **corrective response** actions are being implemented. ~~IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.~~
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, ~~OAM~~ **OAQ** that retesting in one-hundred and twenty (120) days is not practicable, IDEM, ~~OAM~~ **OAQ** may extend the retesting deadline. ~~Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.~~
- (c) **IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.**

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Comments 27 and 28

Paragraph C.19(a)(1), page 22 of 45: Paragraph C.19(a)(1) should be modified to add the word “estimated” between the word “Indicate” and the phrase “actual emissions” located at the beginning of the paragraph. This revision is necessary to more accurately reflect the requirements of 326 IAC 2-6-4(4).

Paragraph C.19(a)(2), page 22 of 45: Paragraph C.19(a)(2) should be modified to add the word “estimated” between the word “Indicate” and the phrase “actual emissions” located at the beginning of the paragraph. This revision is necessary to more accurately reflect the requirements of 326 IAC 2-6-4(4).

Response to Comments 27 and 28

The IDEM agrees. Condition C.19, Emission Statement, parts (a)(1) and (2) have been changed to read as:

- (1) Indicate **estimated** actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate **estimated** actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

Also, part (b) has a sentence added after the address. It reads as:

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Comment 29

Paragraph C.21(c)(4), page 23 of 45: Paragraph C.21(c)(4) should be modified to remove references to Compliance Response Plans because IDEM does not have authority to require compliance response plans. In addition, IDEM should not impose a separate obligation that the Permittee must maintain records sufficient to demonstrate that improper maintenance does not cause a violation. If the records are not sufficient for such proof, then the Permittee may be exposed to a violation for which it cannot defend itself. The Permittee’s defenses, if any are ever needed, are up to the Permittee and should not be mandated by IDEM. Condition C.21(c)(4) should be deleted in its entirety and replaced with the following:

- “(4) Records of preventive maintenance may include, but are not limited to: work orders, parts inventories, and operator’s standard operating procedures. All records shall briefly describe what maintenance and response steps were taken.”

Response to Comment 29

The Compliance Response Plan is made up of the PMP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this plan to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CRP requirement. The authority for the CRP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), and 2-7-6(1). Because the D sections contain specified record keeping conditions according to individual requirements, condition C.21, now listed as C.20, has been shortened to the version below which reads as:

- (a) Records of all required ~~monitoring data, reports~~ and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location, or the Wakarusa location, for a minimum of three (3) years ~~and available upon the request of an IDEM, OAM, representative.~~ The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a ~~written~~ request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) ~~Records of required monitoring information shall include, where applicable:~~
 - (1) ~~The date, place, and time of sampling or measurements;~~
 - (2) ~~The dates analyses were performed;~~
 - (3) ~~The company or entity performing the analyses;~~

- ~~(4) The analytic techniques or methods used;~~
 - ~~(5) The results of such analyses; and~~
 - ~~(6) The operating conditions existing at the time of sampling or measurement.~~
- ~~(e) Support information shall include, where applicable:~~
 - ~~(1) Copies of all reports required by this permit;~~
 - ~~(2) All original strip chart recordings for continuous monitoring instrumentation;~~
 - ~~(3) All calibration and maintenance records;~~
 - ~~(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.~~
- ~~(d) Unless otherwise specified in this permit, A~~ all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

Comment 30

Paragraphs C.22(a) and (d), pages 23 and 24 of 45: Paragraphs C.22(a) and (d) should be revised to remove the reference to quarterly compliance monitoring reports and to replace it with a reference to semi-annual compliance monitoring reports. This revision is necessary because 326 IAC 2-7-5(3)(c) only requires compliance monitoring reports to be submitted at least every six months. There is nothing peculiar at Monaco's facility that warrants or justifies more frequent reporting.

Response to Comment 30

IDEM has authority to require quarterly reports. Reports must be submitted at least every six months under 326 IAC 2-7-5(3)(C)(i). OAQ believes that a period of time longer than every quarter will not provide sufficient reporting of continuous compliance. See the Response to Comment 31 for revisions to this condition based on other issues. This condition, General Reporting Requirements, is now listed as C.21.

Comment 31

Paragraph C.22(e), page 24 of 45: Paragraph C.22(e) should be revised to include the phrase "unless the deviation was described in a previously submitted report" at the end of the first sentence. There is no need to duplicate the reporting of deviations. Therefore, if the deviation has been previously reported, there is no need to also report it on the compliance monitoring report.

Response to Comment 31

So that the source does not duplicate efforts to report deviations on two separate forms. The IDEM has made changes to Condition C.21, General Reporting Requirements, and to the reporting forms themselves. This condition now reads as follows:

General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- ~~(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit - t~~ The source shall submit a Quarterly **Deviation and Compliance Monitoring Report or its equivalent**. Any deviation from ~~the permit~~ requirements and the date(s) of each deviation, **the cause of the deviation, and the response steps taken** must be reported. The **Quarterly Deviation and Compliance Monitoring Report** shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Compliance Data Section, Office of Air ~~Management~~ **Quality**
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, ~~OAM~~ **OAQ**, on or before the date it is due.
- (d) Unless otherwise specified in this permit, ~~any quarterly~~ **all reports** shall be submitted within thirty (30) days of the end of the reporting period. ~~The report does not~~ **All reports do** require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) ~~All instances of deviations as described in Section B-Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- (f) ~~Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. **Reporting periods are based on calendar years.**

Please refer to the Response to Comment 63 for changes made to the Emergency/Deviation Occurrence Report.

Comment 32

Paragraph C.23, page 24 of 45: Paragraph C.23 should be deleted in its entirety. Neither the permit nor the Technical Support Document indicate that this provision is applicable to this source. Therefore, the paragraph should be deleted.

Response to Comment 32

40 CFR 82 regulates the handling of ozone-depleting substances such as Freon in a variety of processes and products including domestic and commercial refrigeration and air-conditioning units and portable fire extinguishers. Most sources include one or more subject units. Maintenance or repair of such units has the potential to release substances controlled under these rules. Condition C.23, Compliance with 40 CFR 82, now listed as C.22, remains unchanged.

Comment 33

Paragraph D.1.3, page 26 of 45: Surface-coating operations had been listed as insignificant activities for particulate emissions and are exempt from 326 IAC 6-3-2.

Response to Comment 33

Any process that is listed as an insignificant activity may still be subject to rule requirements as applicable. A process at or below an exemption level for any criteria pollutant may be exempt from a certain permitting process, but this does not exempt it from other applicable rules. If a facility is subject to 326 IAC 6-3, and its process weight rate is less than 100 pounds an hour, it must meet the allowable emission rate for a process weight rate of 100 pounds an hour (i.e., 0.551 pounds per hour). The OAQ believes this is a logical interpretation of the rule.

Comment 34

Paragraph D.1.5(b)(1)(B), page 26 of 45: Paragraph D.1.5(b)(1)(B) should be revised to add the phrase "as applied" at the end of the last sentence in the paragraph. The sentence should read: "All other thinners have a ten percent (10%) maximum VHAP content by weight as applied; or". This revision is necessary to more accurately reflect the requirements of 40 CFR 63, Subpart JJ, Table 3.

Response to Comment 34

The IDEM agrees that this condition part change can be made to remain consistent with the other requirements of this subpart. Therefore the last sentence of part (B) reads as follows:

All other thinners have a ten percent (10%) maximum VHAP content by weight, **as applied**;

Comment 35

Paragraph D.1.5(b)(2)(A), page 27 of 45: Paragraph D.1.5(b)(2)(A) should be revised to add the phrase “as applied” at the end of the paragraph. This revision is necessary to more accurately reflect the requirements of 40 CFR 63, Subpart JJ, Table 3.

Response to Comment 35

The IDEM agrees. Condition D.1.5, Wood Furniture NESHAP, part (b)(2)(A) has therefore been changed to read as follows:

For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids, **as applied**.

Comment 36

Paragraph D.1.7, page 27 of 45: Paragraph D.1.7 should be revised to delete all references to “facility”. Preventative maintenance plans only apply to control equipment, not facilities. The only control devices are the dry filters, which are addressed in the particulate training requirement. Hence, a “Preventative Maintenance Plan” is not applicable to these sources; preventative maintenance plans were never meant to address daily filter maintenance on spray booths.

Response to Comment 36

The IDEM disagrees. The IDEM, OAQ has no policy documentation that preventive maintenance plans are not meant to address daily filter maintenance on spray booths. The PMP is applicable to emission units and control devices. A control device can be ineffective if the equipment it is associated with has become defective or is operating in a faulty manner. Any preventive maintenance that could effect emissions from the facilities in question should be listed in the Preventive Maintenance Plan. Air baffles and water curtains would require preventive maintenance periodically to insure that they continue to function properly. There will be no change to Condition D.1.7, Preventive Maintenance Plan, as a result.

Comment 37

Paragraph D.1.12(b), page 28 of 45: Paragraph should be deleted since a Preventative Maintenance Plan is not required and the general rules are covered in Section B of the permit.

Response to Comment 37

Please see the Response to Comment 36 regarding preventive maintenance plans. Also, under Condition D.1.12, Monitoring, part (b) exists as a reminder that this is a requirement for the facilities discussed in Section D.1.

Comment 38

Paragraph D.1.14(a)(2), page 28 of 45: Paragraph D.1.14(a)(2) should be deleted in its entirety. The requirement to maintain a log of the dates of VOC use is duplicative and unnecessary in light of the data required for total VOC monthly recordkeeping.

Response to Comment 38

Since the source is required to keep monthly records of VOC usage, the IDEM agrees that (a)(2) is unnecessary. Part (a)(2) has been deleted from condition D.1.14 as follows:

~~A log of the dates of use;~~

As a result of this deletion, all subsequent items have been renumbered, in addition to the item references in part (a).

Comment 39

Paragraph D.1.14(e), page 29 of 45: Paragraph D.1.14(e) should be revised to delete the second sentence in the paragraph and to replace it with the following: “A log of the training program, the list of trained operators, and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.” This revision is necessary

to correct the paragraph in light of the comment concerning paragraph D.1.12(b).

Response to Comment 39

The IDEM disagrees. Please see the Response to Comment 36 regarding preventive maintenance plans. Condition D.1.14, Record Keeping Requirements, part (e) will not be modified as a result.

Comment 40

Paragraph D.1.15(a), page 29 of 45: Paragraph D.1.15(a) should be revised to delete the reference to quarterly summaries and replace it with a reference to semi-annual summaries. This revision is necessary to correspond with the other provisions of D.1.15 and the semi-annual certification requirement.

Response to Comment 40

Condition D.1.15, Reporting Requirements, part (a) corresponds with Condition D.1.1. The reason it is listed as its own separate part is because it does not directly correspond with the other provisions of this condition. The reporting requirements associated with Condition D.1.1, PSD Minor Limit, are quarterly, not semi-annually. As a result there will be no change to this condition.

Comment 41

Paragraph D.1.15(d), page 30 of 45: Paragraph D.1.15(d) should be deleted in its entirety and replaced with the following: "Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report." Paragraph D.1.15(d) currently requires the semi-annual report to be submitted on specific dates instead of on the schedule required by 40 CFR. 63.807(c)(2). Therefore, this revision is necessary for the permit requirements to be consistent with the underlying federal regulation.

Response to Comment 41

The IDEM agrees to replace part (d) with language taken directly from 40 CFR 63, Subpart JJ. The reasoning behind stating specific reporting dates was a result of IDEM, OAQ's consultation with the EPA and sources subject to this requirement, and the desire to have all sources report at the same time. Condition D.1.15 (d) has been changed to read as:

~~The semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.~~ **Pursuant to the schedule required by 40 CFR 63.807(c)(2), subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.**

Since the first year following the commencement of operation for this process has already passed, part (b) of condition D.1.15 has been deleted. It read as:

~~An Initial Compliance Report to document compliance with Condition D.1.5 and the Certification form, shall be submitted within sixty (60) days following the upon the date of construction for B48-6 through B48-8.~~

As a result of this deletion, subsequent parts of this condition have been relettered accordingly. Also, the second sentence of part (c), now listed as part (b), has been deleted. It read as:

~~For the first year following the compliance date, for B48-6 through B48-8, the six (6) month period shall begin on August 1, 1999, because it must begin on the first day of the month after which the operation commences.~~

As a result of the above changes, part (e), now listed as part (d), will reference only part (b) and (c).

Comment 42

Paragraph D.2.2, page 31 of 45: Paragraph D.2.2 should be deleted in its entirety and replaced with the following: "A Preventative Maintenance Plan, in accordance with Section B - Preventative Maintenance Plan, of this permit, is required for the control device associated with this facility." Preventative maintenance plans only apply to control equipment, not facilities.

Response to Comment 42

Please see the Response to Comment 36 regarding preventive maintenance plans. Condition D.2.2, Preventive Maintenance Plan, will not be modified as a result.

Comment 43

Paragraph D.2.4(a)(2), page 31 of 45: Visible emissions shall not exceed 40% opacity, references to 10% opacity may be included in Preventative Maintenance Plans but are not enforceable.

Response to Comment 43

Condition D.2.4, Particulate Matter, part (a)(2) is enforceable because it is a preexisting condition from an issued construction permit. The 10% opacity limit was included pursuant to PC (20) 1730, issued February 21, 1989. Pursuant to 326 IAC 2-1.1-5, the commissioner may impose such conditions on the permit as necessary to ensure that the source or facility will comply with all applicable rules; and that the ambient air quality standards established in 326 IAC 1-3, the prevention of significant deterioration standards established in 326 IAC 2-2, and the offset requirements established in 326 IAC 2-3, will be attained and maintained and the public health will be protected. The opacity limit is also an applicable requirement that must be included in the permit pursuant to 326 IAC 2-7-5(10)(B). The Title V permit is not being made more stringent by adhering to this limit. Therefore, the 10% opacity limit shall not be removed from the permit.

Comment 44

Paragraph D.2.4(b), page 31 of 45: Visible emissions shall not exceed 40% opacity, references to 10% opacity may be included in Preventative Maintenance Plans but are not enforceable.

Response to Comment 44

The IDEM agrees. Since the 10% opacity is not a preexisting requirement from a federally enforceable construction permit, it has been deleted from part (b). As a result, part (b) now reads as follows:

- (b) Cyclone D42-01, for PM control, shall be in operation at all times when the woodworking facilities are in operation ~~and the visible emissions from this cyclone shall not exceed 10% opacity.~~

Comment 45

Paragraph D.2.5, page 31 of 45: Paragraph D.2.5 should be revised to change the monitoring requirement from “daily” to “monthly”. The monitoring requirement is primarily directed at cyclones, baghouse does not discharge to atmosphere, and cyclones are of such simple design and operation that daily monitoring is unnecessary and overly burdensome.

Response to Comment 45

The IDEM disagrees. Regarding the baghouse, exhausting into the building does not ensure that no emissions will escape from the building into the atmosphere, also this condition specifies clearly that the notation shall be performed when exhausting to the atmosphere. If noticeable particulate matter were to be emitted from a control device that exhausts inside the building, the employees working in that area would be reasonably expected to open doors or windows to allow the room to clear.

Note that the reference method for determining compliance with the limitations that apply to particulate matter emissions from these facilities is a “method 5 stack test”; however, the OAQ does not believe that such a test is necessary to demonstrate compliance at this time. If the source would like to demonstrate that the baghouse and cyclones are not necessary for the woodworking operations to stay in compliance with the PM limit, then a performance test can be conducted.

The visible emission notations are used to indicate compliance with 326 IAC 5-1 and 326 IAC 6, without the requirement to have a person on site trained in opacity measurement. This requirement is designed as a trigger that the source perform some corrective action on the facility if visible emissions are abnormal, to ensure continuous compliance with emission limitations. It has not been demonstrated sufficiently that the dust collectors and cyclones are not needed for the woodworking operations to stay in compliance. Therefore, it is reasonable for the IDEM to

require the visible emission observations and control device inspections for the woodworking. Please note again that visible emission notations and quarterly inspections are only required when emissions are vented to the outside atmosphere. There will be no change to this condition as a result of the above comment. However, for clarification, a new sentence has been added to part (e). It reads as:

Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Comment 46

Paragraph D.2.6(a), page 32 of 45: Paragraph D.2.6(a) should be revised to amend the sentence "Inspections are optional when venting to the indoors." to state "Inspections are not required when venting to the indoors." IDEM does not have any jurisdiction over venting to the indoors. Therefore, the paragraph should not reference what may or may not apply to indoor venting.

Response to Comment 46

The key word in the phrase cited above is "optional". Its basic meaning is "left to choice". It is well known that some sources continue these inspections when venting indoors as a courtesy to their employees and to ensure good house keeping practices. It is not a requirement to perform inspections on the PM control equipment listed in the condition when the equipment is venting indoors. The suggested change above has the same meaning as what is already written in the permit, and therefore, it isn't necessary to change Condition D.2.6, Particulate Control Equipment Inspections.

Comment 47

Paragraph D.2.6(b), page 32 of 45: Paragraph D.2.6(b) should be revised to amend the sentence "Inspections are optional when venting to the indoors." to state "Inspections are not required when venting to the indoors." IDEM does not have any jurisdiction over venting to the indoors. Therefore, the paragraph should not reference what may or may not apply to indoor venting.

Response to Comment 47

Please see the Response to Comment 46.

Comment 48

Paragraph D.2.7(a)(1), page 32 of 45: Paragraph D.2.7(a)(1) should be revised to remove the references to Compliance Response Plans. As stated in the comment to paragraph C.21(c)(4), IDEM does not have authority to require compliance response plans.

Response to Comment 48

Please see the Response to Comment 29 regarding IDEM's authority to require CRPs. No change to Condition D.2.7 will be made as a result. However, several changes have been made to further clarify the condition. The changes to part (a)(1) are:

For multi-compartment units,† The affected compartments will be shut down immediately until the failed units have been repaired or replaced. **Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions).** Within eight (8) **business** hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) **business** hours of discovery of the failure and shall include a timetable for completion. **Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.** ~~Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B- Emergency Provisions).~~

And part (b) has a new sentence added at the end. It reads as:

Failure to take response steps in accordance with Section C- Compliance Response Plan- Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Comment 49

Paragraph (a) in the Section D.3 description box, page 34 of 45: Paragraph (a) in the Section D.3 description box should be revised to delete the phrase “with dry filters for overspray and”. This revision is necessary so the description box corresponds to paragraph A.2(c)(1).

Response to Comment 49

Please see the Response to Comment 2. No change to this description will be made as a result.

Comment 50

Paragraph (c) in the Section D.3 description box, page 34 of 45: Paragraph (c) in the Section D.3 description box should be revised to delete the phrase “controlled by dry filters”. This revision is necessary so the description box corresponds to paragraph A.2(c)(3).

Response to Comment 50

Please see the Response to Comment 3.

Comment 51

Paragraph (d) in the Section D.3 description box, page 34 of 45: Paragraph (d) in the Section D.3 description box should be revised to delete the phrase “controlled by dry filters”. This revision is necessary so the description box corresponds to paragraph A.2(c)(4).

Response to Comment 51

Please see the Response to Comment 4.

Comment 52

Paragraph D.3.1(b), page 34 of 45: Fiberglass operations had been listed as insignificant activities for particulate emissions and are exempt from 326 IAC 6-3-2.

Response to Comment 52

Please see the Response to Comment 33. No change to Condition D.3.1, Particulate Matter, will be made as a result.

Comment 53

Paragraph D.3.2(b), page 34 of 45: Paragraph D.3.2(b) is identical to paragraph D.1.1(b) of permit CP 039-10299-00087 which is the subject of an appeal. As stated in the appeal of this condition in permit CP 039-10299-00087, the condition in paragraph D.3.2(b) purports to establish monthly emission limits. The applicable regulations only impose annual emission limits; they do not impose or authorize monthly emission limits. Therefore, paragraph D.3.2(b) should be deleted in its entirety.

Response to Comment 53

According to the date on the affidavit of construction for permit 039-10299-00087, this operation has already operated for 12 months making part (b) of the condition below unnecessary. Therefore, this condition part has been deleted from the Title V operating permit since the process has been in operation for more than 12 months. Condition D.3.2, Volatile Organic Compounds, has been revised as follows:

~~Pursuant to CP 039-10299-00087, issued February 5, 1999:~~

- (a) **Pursuant to CP 039-10299-00087, issued February 5, 1999,** the VOC content of the gel coats and resins delivered to the applicator of the fiberglass operation shall be limited such that the potential emissions of VOC shall be less than twenty-five (25) tons per twelve (12) consecutive months, rolled on a monthly basis. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

- (b) ~~During the first 12 months of operation, the VOC emissions shall be limited such that the total emissions divided by the accumulated months of operation shall be less than 2.08 tons per month.~~

Since this same requirement has been fulfilled for condition D.3.3, Hazardous Air Pollutants, and no longer applicable because the 12 months has passed, parts (b) and (c) have been deleted, and part (a) modified, as follows:

~~Pursuant to CP 039-10299-00087, issued February 5, 1999:~~

- (a) **Pursuant to CP 039-10299-00087, issued February 5, 1999,** ~~the~~ HAP content of the gel coats and resins delivered to the applicator of the fiberglass operation shall be limited such that the potential emissions of HAPs shall be limited such that the potential to emit (PTE) of a single HAP shall be less than ten (10) tons per twelve (12) consecutive months and a combination of HAPs shall be less than twenty-five (25) tons per twelve (12) consecutive months, each rolled on a monthly basis. Therefore, 326 IAC 2-1-4.4, New Source Toxics Control, does not apply.
- (b) ~~During the first 12 months of operation, the single HAP emissions shall be limited such that the total emissions divided by the accumulated months of operation shall be less than 0.833 tons per month.~~
- (c) ~~During the first 12 months of operation, the combination HAPs' emissions shall be limited such that the total emissions divided by the accumulated months of operation shall be less than 2.08 tons per month.~~

Comment 54

Paragraph D.3.4, page 35 of 45: Paragraph D.3.4 – Preventative Maintenance Plans, should be deleted since this source is not required to have any control devices.

Response to Comment 54

Please see the Response to Comment 36. No change to Condition D.3.4, Preventive Maintenance Plan, will be made as a result.

Comment 55

Paragraph D.3.7(b), page 35 of 45: Paragraph D.3.7(b) purports to adopt a reference approved by IDEM or that may be applied by IDEM in a manner inconsistent with the scope or intent of the CFA, without preserving permittee's right to object.

Response to Comment 55

All objections by the Permittee could have been presented during the time of the public notice period for CP 039-10299-00087, which is the initial document from which this condition came. With regards to the above comment, at no time has the Permittee stated its view on what it believes to be the manner that is inconsistent with the scope or intent of the CFA. The Permittee also did not comment on this issue during an informal Title V draft review of their operating permit. The condition fully and clearly explains that this is a reference "until such time that new emissions information is made available..." The reference approved until such time had been technically reviewed during the construction permitting process for this equipment and would have not been used had there been discrepancies or controversial issues regarding this reference. Should the source have an increase in emissions for this process in the future, it is most likely that the EPA will have the new emissions information available and that this would then be the reference used in the review. As a result, no change to Condition D.3.7, VOC Emissions, part (b) has been made.

Comment 56

Paragraph D.3.8(b), page 35 of 45: Paragraph D.3.8(b) purports to adopt a reference approved by IDEM or that may be applied by IDEM in a manner inconsistent with the scope or intent of the CFA, without preserving permittee's right to object.

Response to Comment 56

Please see the Response to Comment 55. No change to Condition D.3.8, HAP Emissions, will be made as a result.

Comment 57

Paragraph D.3.9, page 35 of 45: Paragraph D.3.9 should be deleted in its entirety because the facility complies with

the applicable particulate emission limitations without the use of controls.

Response to Comment 57

Note that the reference method for determining compliance with the limitations that apply to particulate matter emissions from these facilities is a "method 5 stack test"; however, the OAQ does not believe that such a test is necessary to demonstrate compliance at this time. If the source would like to demonstrate that the dry filters are not necessary for the fiberglass operations to stay in compliance with the PM limit, then a performance test can be conducted. Condition D.3.9, Particulate Matter, will not be deleted as a result.

Comment 58

Paragraph D.3.10, page 36 of 45: Paragraph D.3.10 should be deleted in its entirety, no control device, operator training, or preventative maintenance plan is required for this facility.

Response to Comment 58

Please see the Response to Comment 36. Condition D.3.10, Monitoring, will not be deleted as a result.

Comment 59

Paragraph D.3.11(a)(2), page 36 of 45: Paragraph D.3.11(a)(2) should be deleted in its entirety. The requirement to maintain a log of the dates of VOC use is duplicative and unnecessary in light of the data required for total VOC monthly recordkeeping.

Response to Comment 59

Please see the Response to Comment 38. Part (a)(2) of Condition D.3.11, Record Keeping Requirements, has been deleted. As a result, all subsequent items have been renumbered, in addition to the item references in part (a).

Comment 60

Paragraph D.3.11(b), page 36 of 45: Paragraph D.3.11(b) should be deleted in its entirety. Paragraph D.3.11(b) applies to paragraph D.3.9 which, as previously stated, should be deleted in its entirety. Please refer to the comments associated with paragraph D.3.9.

Response to Comment 60

Please see the Response to Comment 57. Part (b) of Condition D.3.11, Record Keeping Requirements, will not be deleted as a result.

Comment 61

Paragraph D.3.11(c), page 36 of 45: Paragraph D.3.11.(c), should be deleted in its entirety, no control device, operator training or preventative maintenance plan is required for this facility.

Response to Comment 61

Please see the Response to Comment 36. Also, this condition is a previously existing condition incorporated from CP 039-10299-00087, issued February 5, 1999. Part (c) of Condition D.3.11, Record Keeping Requirements, will not be deleted as a result.

Comment 62

Paragraph D.4.1, page 38 of 45: Maintenance activities have been listed as insignificant activities for particulate emissions and are exempt from 326 IAC 6-3-2.

Response to Comment 62

Please see the Response to Comment 33. Condition D.4.1, Particulate Matter, will remain as is. Also, please note that

the words "and extrapolation" have been deleted from the third sentence of this condition. This revision has been made to condition D.2.1 as well.

Comment 63

Part 70 Operating Permit Emergency/Deviation Occurrence Report, page 40 of 45: This report should be revised to cover only Emergencies. As previously stated, reporting deviations should only be required as part of a semi-annual report, assuming the deviation was not previously identified in another report.

Response to Comment 63

The IDEM agrees that emergencies should be reported on a separate form. As a result, the Emergency/Deviation Occurrence Report Form is now called the Emergency Occurrence Report. All references to deviations have been removed from this report form (See the Response to Comment 65). This revised report form should be sent to the Compliance Branch, not the Compliance Data Section. The EPA agrees to allow the 2 day emergency occurrence notification to come in without the responsible official certification as long as the emergencies are included in the Quarterly Deviation and Compliance Monitoring Report which is certified by the responsible official and complies with the Part 70 requirement to have all reports certified.

Comment 64

Part 70 Quarterly Reports, pages 43 and 44 of 45: These reports should be renamed as semi-annual reports.

Response to Comment 64

Please see the Response to Comment 30 regarding reporting frequency. In addition, the monthly and quarterly reports need to be certified by the responsible official, therefore the last line in each of these reports have been changed from ~~A certification is not required for this report to~~ **Attach a signed certification to complete this report.**

Comment 65

Part 70 Operating Permit Quarterly Compliance Monitoring Report, page 45 of 45: This report should be renamed as a semi-annual report.

Response to Comment 65

Please see the Response to Comment 30 regarding reporting frequency. The deviation portion of the Emergency reporting form has been combined into the Quarterly Compliance Monitoring report and is now called the Quarterly Deviation and Compliance Monitoring Report. The form now requires the source to not only report that there were deviations, but to also include the probable cause and the response steps taken. We are no longer requiring sources to report deviations in ten days, therefore every source will need to submit this report quarterly. For sources with an applicable requirement which gives an alternate schedule for reporting deviations, those deviations will not need to be reported quarterly, but instead should be reported according to the schedule in the applicable requirement.

Comment 66

Technical Support Document. IDEM should revise the Technical Support Document to incorporate the comments described above.

Response to Comment 66

The Office of Air Quality (OAQ) corrects permit errors in the form of a technical support addendum. The original technical support document does not change from the first proposal in order to maintain the integrity of the review process. The technical support document is utilized as a technical tool that allows the source to understand OAQ's decision in a more detailed manner. This document is not an enforceable document, but an aid to the source's permit.

Comment 67

The permit modifications being suggested are primarily directed at minor particulate sources and excessive recordkeeping and monitoring requirements. This facility has a number of extremely small particulate emission sources and the level of monitoring being proposed is unwarranted and burdensome with little environmental benefit. Monaco

Coach believes that for these minor particulate emission sources, that a well-established and documented training program can more effectively assure proper operation of the control equipment and provide adequate compliance assurances to IDEM.

Response to Comment 67

The IDEM believes that the requirements listed in the Title V operating permit for this source are not extreme or overly burdensome for a major Part 70 source.

Additional Changes

The following items address changes made to the permit by the IDEM OAQ which were not the direct result of any particular comment made by this source.

1. Condition B.1, Definitions (previously B.2), has revisions in the second sentence. This sentence now reads as:

In the absence of definitions in the referenced regulation, the applicable definitions found in **the statutes or regulations** (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

2. A new rule cite, **[326 IAC 2-1.1-9.5]**, has been added to the title line of condition B.3, Permit Term. This condition is now B.2. For clarity, the language of the condition has been changed to read as:

This permit is issued for a fixed term of five (5) years from the **effective original** date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. **Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.**

3. Condition B.4, Enforceability, now listed as B.3, has the following changes:

(a) ~~All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.~~

(b) Unless otherwise stated, **all** terms and conditions ~~of in~~ this permit, including any provisions to limit the source's potential to emit, are enforceable by **IDEM**, the United States Environmental Protection Agency (U.S. EPA) and **by** citizens ~~under in accordance with~~ the Clean Air Act.

4. Condition B.8, Duty to Supplement and Provide Information, now B.7, has a new rule cite, **[326 IAC 2-7-6(6)]**, added to the title line of this condition. The following sentence has been added to the end of part (a):

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Also parts (b) and (c) now read as:

(b) The Permittee shall furnish to IDEM, OAM **Q**, within a reasonable time, any information that IDEM, OAM **Q**, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. **The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]**

(c) ~~Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.~~

5. B.8, Compliance with Permit Conditions (previously B.9), has been revised to clarify that noncompliance with any requirement of this permit may result in an enforcement action against the Permittee, an action to modify,

revoke, reissue or terminate the source's permit, and/or a denial of the Permittee's application to renew the permit. In addition, except for those permit conditions that are not federally enforceable, noncompliance is also a violation of the federal Clean Air Act. The IDEM OAQ has revised all parts of condition B.8 to read as:

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit ~~except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and~~ is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) **Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.**
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) **An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

1. Condition B.10, Certification, now listed as B.9, has a deletion in the first sentence of part (a):

Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted ~~under this permit~~ shall contain certification by a responsible official of truth, accuracy, and completeness.

And part (b) is changed to:

One (1) certification shall be included, ~~on~~ **using** the attached Certification Form, with each submittal **requiring certification**.

2. Several parts of the Emergency Provisions condition (now B.12) have changes. Because this condition is lengthy, it is not necessary to list it here in its entirety. The affected parts and changes are as follows:

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation ~~, except as provided in 326 IAC 2-7-16.~~
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (b)(5) For each emergency lasting one (1) hour or more, the Permittee submitted **notice the attached Emergency Occurrence Report Form or its equivalent**, either ~~in writing by mail~~ or facsimile, ~~of the emergency~~ to:
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) ~~for sources subject to this rule after the effective date of this rule~~. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, ~~OAMQ~~, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(4) ~~9~~ be revised in response to an emergency.
 - (f) Failure to notify IDEM, ~~OAMQ~~, by telephone or facsimile of an emergency lasting more than one (1) hour in ~~compliance accordance~~ with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) ~~Operations may continue during an emergency only if the following conditions are met:~~
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) ~~If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~

- (A) ~~The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~
- (B) ~~Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

8. Condition B.15, Multiple Exceedances, has been deleted from this permit and replaced by another condition. This new condition, now B.14, helps clarify the intent of the new rule 326 IAC 2-1.1-9.5. The changes are as follows:

B.15 4 Multiple Exceedances [326 IAC 2-7-5(1)(E)] Prior Permits Superseded [326 IAC 2-1.1-9.5]

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

- (a) **All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either**

- (1) **incorporated as originally stated,**
- (2) **revised, or**
- (3) **deleted**

by this permit.

- (b) **All previous registrations and permits are superseded by this permit.**

Because this condition was added, part (b) of the Permit Shield condition was deleted as shown in the Response to Comment 9 of this document.

9. B.17, Permit Modification, Reopening, Revocation and Reissuance, or Termination, now B.16, has the following added to the end of part (a):

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

10. B.19, Permit Amendment or Modification, now B.18, has the following change to part (a):

~~The Permittee must comply with~~ **Permit amendments and modifications are governed by** the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

And part (b) has the following revisions:

Any such application ~~should~~ **shall** be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) ~~only if a certification is required by the terms of the applicable rule.~~

11. B.21, previously listed as B.22, has been deleted and replaced with the following:

Construction Permit Requirement [326 IAC 2-7-10.5] Source Modification Requirement [326 IAC 2-7-10.5]

~~A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2~~ **A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.**

12. B.24, Transfer of Ownership or Operational Control, now listed as B.23, has a deletion in the last sentence of part (b) which now reads as:

The application which shall be submitted by the Permittee does ~~not~~ require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

13. B.25, Annual Fee Payment, now listed as B.24, has a rule cite added for reference in the second sentence of part (a), as follows:

Pursuant to 326 IAC 2-7-19(b), If the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

14. Since B.26 is not applicable to the source based on the Title V application review for this operating permit, it has been deleted from the permit. It read as:

~~B.26 **Advanced Source Modification Approval** [326 IAC 2-7-5(16)]
The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 if such modifications occur during the term of this permit.~~

15. C.7, Operation of Equipment, now reads as:

Except as otherwise provided **by statute or rule**, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units **vented to the control equipment** are in operation.

16. C.8, Stack Height, has the following sentence added for clarity:

The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

17. C.13, Maintenance of Monitoring Equipment, is now called 'Maintenance of **Emission** Monitoring Equipment'.

18. C.14, Monitoring Methods, has two rule cites added to the title line of the condition. They are **[40 CFR 60]** and **[40 CFR 63]**. Also, the following has been added:

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, **40 CFR 60 Appendix B, 40 CFR 63**, or other approved methods as specified in this permit.

19. The last sentence of part (b) under C.15, Emergency Reduction Plans, has a deletion as shown below:

The ERP does ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

20. Condition D.1.13 has been moved under Compliance Determination Requirements in section D.1 of the permit because the dry filters must be in operation in order for the Permittee to demonstrate compliance with D.1.3. Previously, it was under Compliance Monitoring Requirements. The Table of Contents has also been changed to reflect this.

21. As a reminder to the Permittee, the phrase "**Attach a signed certification to complete this report**" has been added to the bottom of the Wood Furniture NESHAP Semi-Annual Report.

22. Lastly, the first sentence of the Quarterly Deviation and Compliance Monitoring Report, "*This report is an affirmation that the source has met all the requirements stated in this permit*", has been deleted from this reporting form because it may appear to conflict with the Annual Compliance Certification.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Monaco Coach Corporation
Source Location: 1205 East Lincoln Street, Nappanee, Indiana 46550
County: Elkhart
SIC Codes: 2434, 2431, 2511, 3083, 3716, 3792
Operation Permit No.: T039-6116-00087
Permit Reviewer: Melissa Groch

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Monaco Coach Corporation relating to the operation of a wood furniture and a fiberglass panel manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Surface Coating:

- (1) Five (5) paint booths, located in Plant 48, identified as B48-1 through B48-5, constructed in 1984, equipped with five (5) HVLP spray guns for wood furniture and cabinet coating, with a maximum capacity at each spray booth of five (5) gallons per hour of coating, using dry filters for overspray control, and exhausting at stacks SV48-01 for booth B48-1, SV48-02 for B48-2, SV48-03 for B48-3, SV48-04 for B48-4, and SV48-05 for B48-5.
- (2) One (1) wood finishing paint line, located in Plant 48, consisting of the following equipment:
 - (A) One (1) wood prep and clean-up area with a total maximum raw material throughput of 120 units per hour per booth; and
 - (B) Three (3) paint booths, identified as B48-6 through B48-8, constructed in 1999, equipped with three (3) HVLP guns for stain, topcoat and sealer applications, with a total maximum raw material throughput of 120 units per hour per booth, using dry filters for overspray control, and exhausting at stacks SV48-6, SV48-7 and SV48-8, respectively.

(b) Woodworking Operations controlled by:

- (1) One (1) baghouse for particulate control, located in Plant 48, identified as D48-01, with a maximum capacity of 10000 pounds per hour, and exhausting at stack D48-01.
- (2) One (1) cyclone for particulate control, located in Plant 48, identified as D48-02, with a maximum capacity of 2000 pounds per hour, and exhausting at stack D48-02.
- (3) One (1) cyclone for particulate control, located in Plant 42, identified as D42-01, with a maximum capacity of 2000 pounds per hour, and exhausting at stack D42-01.

(c) Fiberglass Operations:

- (1) One (1) fiberglass motor home parts manufacturing line, consisting of one (1) air assisted airless gel coat application system, one (1) air assisted airless resin application system and one (1) flow coat resin application system, with dry filters for overspray and exhausting to stack GV42.
- (2) One (1) fiberglass prep and clean-up area, exhausting to stack GV42.

- (3) One (1) sander, controlled by dry filters exhausting to stack GV42.
- (4) Two (2) routers, controlled by dry filters with both exhausting to stack GV42.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities:

One (1) lamination spray adhesive booth, located in Plant 42, identified as lam42, using one (1) HVLP spray gun, with a maximum capacity of 14 gallons per day of adhesive, using dry filters for overspray control, and exhausting at GV42.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (a) Two (2) space heaters, located in Plant 41, collectively identified as SH41, with maximum ratings at 0.06 MMBtu per hour each.
 - (b) Eight (8) space heaters, located in Plant 42, collectively identified as SH42-A, with maximum ratings at 0.16 MMBtu per hour each.
 - (c) One (1) space heater, located in Plant 42, identified as SH42-B, with a maximum rating at 0.06 MMBtu per hour.
 - (d) One (1) space heater, located in Plant 43, collectively identified as SH43, with maximum rating at 0.2 MMBtu per hour.
 - (e) One (1) furnace, located in Plant 43, identified as FA43, with a maximum rating of 0.15 MMBtu per hour.
 - (f) Seventeen (17) space heaters, located in Plant 48, collectively identified as SH48, with maximum ratings at 0.1 MMBtu per hour each.
 - (g) One (1) furnace, located in Plant 48, identified as FA48, with a maximum rating of 0.15 MMBtu per hour.
 - (h) One (1) natural gas-fired air make-up unit, located in Plant 48, identified as AMU48-1, with a maximum rating of 4.3 MMBtu per hour, exhausting at stack AMU48-1.
 - (i) One (1) natural gas-fired air make-up unit, located in Plant 48, identified as AMU48-2, with a maximum heat input capacity of 4.8 MMBtu per hour, exhausting at stack AMU48-2.
- (2) The following equipment, identified as W43 and T43, located in Plant 43, related to manufacturing activities not resulting in the emissions of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment.
- (3) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.
- (4) Paved and unpaved roads and parking lots with public access.
- (5) Degreasing operations, located in Plant 43, identified as DG43, using mineral spirits as solvent, with a maximum throughput of 0.3 gallons per day, and exhausting at stack GV43.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) CP 039-10442-00087, issued on April 21, 1999;
- (2) CP 039-10299-00087, issued on February 5, 1999;
- (3) CP 039-1996-00087, issued on July 19, 1991;
- (4) PC (20) 1730, issued on February 21, 1989; and
- (5) Exemption issued on March 4, 1987.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (1) CP 039-1996-00087, issued on July 19, 1991

Operation Condition 5:

That the total amount of solvent (VOC) delivered to the glue post forming machine shall be limited to 39.6 tons per year, based on a twelve month average rolled on a monthly basis. During the first 12 months of operation, solvent usage shall be limited such that, total solvent used divided by months of operation shall not exceed 3.3 tons per month. Therefore, the Emission Offset rule, 326 IAC 2-3 will not apply.

Reason not incorporated:

The glue post forming machine was sold with Plant 40 in 1994. This is now a separate privately owned source known as Creative Dimensions.

- (2) PC (20) 1730, issued on February 21, 1989

Operation Condition 1:

That particulate matter overspray from the surface coating facilities shall be considered in compliance with 326 IAC 6 provided that the overspray is not:

- a. visibly detected at the exhaust,
- b. accumulated on the rooftops or on the ground, or
- c. causing any nuisance problems.

Reason not incorporated:

This condition was not incorporated as is because the surface coating operations are subject to revised compliance monitoring conditions, as stated in this permit.

Operation Condition 2:

That the particulate matter emissions from the woodworking facilities shall be considered in compliance with 326 IAC 6 provided that:

- a. visible emissions do not exceed 10% opacity,
- b. fugitive dust complies with 326 IAC 6-4, and
- c. no public nuisance is created.

Reason not incorporated:

This condition was not incorporated as is because the woodworking operations are subject to revised compliance monitoring conditions, as stated in this permit.

Operation Condition 3:

That the coating organic solvent concentration and gallons applied shall be limited such that the total amount of organic solvent delivered to the surface booths in Plt. Nos. 42 and 48 shall not exceed 8.3 tons per month (99.6 tons per twelve consecutive month period).

Reason not incorporated:

The source has requested that they use less than 250 tons per year of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

At the time the construction permit listed above was written, Elkhart county was designated as nonattainment for ozone. In 1994, Elkhart county was redesignated to attainment. Therefore, previous limits can be relaxed and a total source VOC limit can be set for less than 250 tons of VOCs per year.

Operation Condition 5:

That pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) shall be the use of air assisted airless spray guns for the top coats and sealers for the facilities in Plant 48.

Reason not incorporated:

This operation condition was not incorporated because the surface coating facilities are subject to 326 IAC 8-2-12, and BACT only applies to such facilities which are not otherwise regulated by other provisions of this article (326 IAC 8).

The surface coating facilities, B48-1 through B48-5, are subject to 326 IAC 8-2-12 because they are applicable under 326 IAC 8-2-1(a)(3), in that they existed as of July 1, 1990, and are a type of operation described in section 12 of this rule, with a location in Elkhart County. Also, they have actual emissions greater than fifteen (15) pounds of VOC per day before add-on controls.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled Unpermitted Emission Units and Pollution Control Equipment.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on June 11, 1996.

A notice of completeness letter was mailed to the source on August 27, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations, pages 1 through 6.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	greater than 250
PM-10	greater than 250
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Toluene	greater than 10
Xylene	greater than 10
combination	greater than 25
TOTAL	greater than 25

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of VOCs and PM-10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 OAM emission data. The HAPs information reflects the 1997 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	10.000
PM-10	5.021
SO ₂	0.000
VOC	28.482
CO	0.000
NO _x	0.000
Methanol	1.360
MIBK	1.767
Toluene	4.702
Xylene	3.038

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) Pursuant to PC (20) 1730, issued February 21, 1989, the surface coating operations, B48-1 through B48-5, have no applicable New Source Performance Standards (326 IAC 12).
- (b) Pursuant to CP 039-10442-00087, issued on April 21, 1999, for B48-6 through B48-8, and pursuant to this permit for all other surface coating, the wood furniture coating operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998, and upon commencement of operation for B48-6 through B48-8.

Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

- (a) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (1) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids as applied; or
 - (2) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 1.0 pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a 3.0 percent maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10.0%) maximum VHAP content by weight; or
 - (3) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (4) Use a combination of (1), (2), and (3).
- (b) Limit VHAP emissions contact adhesives as follows:
 - (1) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight-tenths (1.8) pound VHAP per pound solids.
 - (2) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids as applied.
 - (3) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

- (c) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids as applied.
 - (d) The source shall complete a work practice implementation plan within sixty (60) calendar days after the source's compliance date as specified in 40 CFR 63.803. The plan must detail how the source will incorporate environmentally desirable practices into operation.
 - (e) A semi-annual summary report shall be prepared and submitted to IDEM, OAM, to document the ongoing compliance status of the wood furniture coating operations.
 - (f) A copy of this rule is enclosed.
- (d) Pursuant to CP 039-10299-00087, issued February 5, 1999, there are no New Source Performance Standards (326 IAC 12 and 40 CFR Part 60) applicable to the fiberglass operations.
 - (e) Pursuant to CP 039-10299-00087, issued February 5, 1999, there are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to fiberglass operations.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on June 11, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-2 and 40 CFR 52.21 (PSD Minor Limit)

This source shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOCs. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

The source will be required to annually submit a statement of the actual emissions of all federally regulated pollutants from the source, for the purpose of fee assessment.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Surface Coating Operations

326 IAC 2-2, 40 CFR 52.21 (PSD Minor Limit)

- (a) The entire source shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2

(Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

- (b) Previously, the usage of paint booths B48-1 through B48-5 (pursuant to PC (20) 1730, issued February 21, 1989) were limited to less than 8.3 tons per month of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit was required to limit the potential to emit of VOC to less than 99.6 tons per 12 consecutive month period so that compliance with this limit made 326 IAC 2-3 (Emission Offset) not applicable. This limit is no longer necessary because the source is able to operate these facilities under part (a) of this section.
- (c) For the purposes of the construction review process, the lamination spray adhesive booth (lam42), located in Plant 42, constructed in 1986, shall also be included in the above VOC limit for the entire source. This facility was not included in the application for PC (20) 1730, issued February 21, 1989, even though it was constructed in 1986.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, and pursuant to PC (20) 1730, issued on February 21, 1989 for B48-1 through B48-5, and pursuant to the Exemption issued on March 4, 1987, and CP 039-10442-00087, issued April 21, 1999 for B48-6 through B48-8, the PM from the surface coating operations, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the surface coating operations are in operation.

326 IAC 8-2-12 (Volatile Organic Compounds)

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), for B48-1 through B48-5, and lam42, and pursuant to CP 039-10442-00087, issued April 21, 1999, for B48-6 through B48-8, the surface coatings applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

Woodworking Operations

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 12.05 pounds per hour for D48-01, and 4.10 pounds per hour each for D48-02 and D42-01, when operating at a process weight rate of 10000 pounds per hour for D48-01, and 2000 pounds per hour for each D48-02 and D42-01, respectively. The pounds per hour limitations were calculated using the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The baghouses for PM control shall be in operation at all times the woodworking facilities are in operation, in order to comply with this limit.

Since the potential PM emissions from D48-01 are 360 pounds per hour, which is greater than the allowable of 12.05 pounds per hour, the baghouse must be operating at all times. With a collection efficiency of 99%, the after controls PM emissions are 3.6 pounds per hour which is less than the allowable. Therefore, this facility is in compliance with 326 IAC 6-3.

Since the potential PM emissions from D48-02 and D42-01 are 78.9 pounds per hour each, which is greater than their allowable of 4.10 pounds per hour each, the cyclones must be operating at all times. With collection efficiencies of 95% each, the after control PM emissions are 3.95 pounds per hour each which is less than the allowable. Therefore, they are in compliance with 326 IAC 6-3.

Fiberglass Operations

326 IAC 6-3 (Process Operations)

Pursuant to CP 039-10299-00087, issued February 5, 1999, and 326 IAC 6-3 (Process Operations):

- (a) The fiberglass panel manufacturing line shall have a PM allowable emission using the following equation:

$$E = 4.10 P^{0.67}$$

Where: E = rate of emissions in pounds hour
P = Process weight rate in tons per hour

- (b) Pursuant to CP 039-10299-00087, issued February 5, 1999, and 326 IAC 6-3 (Process Operations), the two (2) routers and one (1) sander have a process weight rate of 75 pounds per hour each and are not already regulated by 326 IAC 6-1 or any New Source Performance Standard, therefore the allowable PM emissions shall not exceed 0.551 pounds per hour each.

The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the fiberglass operation is in operation.

326 IAC 8-1-6 (Volatile Organic Compounds)

Pursuant to CP 039-10299-00087, issued February 5, 1999:

- (a) The VOC content of the gel coats and resins delivered to the applicator of the fiberglass operation shall be limited such that the potential emissions of VOC shall be less than twenty-five (25) tons per twelve (12) consecutive months, rolled on a monthly basis. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.
- (b) During the first 12 months of operation, the VOC emissions shall be limited such that the total emissions divided by the accumulated months of operation shall be less than 2.08 tons per month.

326 IAC 2-1-4.4 (Hazardous Air Pollutants)

Pursuant to CP 039-10299-00087, issued February 5, 1999:

- (a) The HAP content of the gel coats and resins delivered to the applicator of the fiberglass operation shall be limited such that the potential emissions of HAPs shall be limited such that the potential to emit (PTE) of a single HAP shall be less than ten (10) tons per twelve (12) consecutive months and a combination of HAPs shall be less than twenty-five (25) tons per twelve (12) consecutive months, each rolled on a monthly basis. Therefore, 326 IAC 2-1-4.4, New Source Toxics Control, does not apply.
- (b) During the first 12 months of operation, the single HAP emissions shall be limited such that the total emissions divided by the accumulated months of operation shall be less than 0.833 tons per month.

- (c) During the first 12 months of operation, the combination HAPs' emissions shall be limited such that the total emissions divided by the accumulated months of operation shall be less than 2.08 tons per month.

Insignificant Activities

326 IAC 6-3 (Process Operations)

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from facilities W43 and T43 shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

326 IAC 8-3 (Organic Solvent Degreasing Operations)

Pursuant to 326 IAC 8-3-1(a)(2), new facilities constructed after January 1, 1980, performing organic solvent degreasing operations located anywhere in the state, are subject to sections 2 through 4 of this rule.

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operating requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Pursuant to 326 IAC 8-3-1(b)(1)(A), applicable degreasing operations located in Elkhart County that are cold cleaner degreasers without remote solvent reservoirs, are subject to the provisions of sections 5 through 7 of this rule.

Because the cold cleaner operation, DG43, located in Plant 43, has a remote solvent reservoir, sections 5 through 7 do not apply.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring and determination requirements applicable to this source are as follows:

1. The surface coating and fiberglass facilities have applicable compliance monitoring and determination conditions as specified below:
 - (a) All operators that perform painting operations or booth maintenance, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
 - (b) Training shall include proper filter alignment, filter inspection and maintenance, and troubleshooting practices. The training program shall be written and retained on site. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.
 - (c) All operators shall be given refresher training annually.

These conditions are necessary because the surface coating operations must be operating properly at all times each process is in operation to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

2. The woodworking and fiberglass facilities have applicable compliance monitoring and determination conditions as specified below:
 - (a) Daily visible emissions notations of the woodworking and fiberglass stacks' exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (b) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

In the event that bag failure has been observed:

- (1) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These conditions are necessary because the controls for the woodworking facilities, and the fiberglass facilities must be operating properly at all times to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See the Appendix regarding attached calculations for detailed air toxic calculations on pages 2 and 3 of 6.

Conclusion

The operation of this wood furniture and fiberglass panel manufacturing source shall be subject to the conditions of the attached proposed Part 70 Permit No. T039-6116-00087.

**Appendix A: Emissions Calculations
VOC and Particulate**

Page 1 of 6 TSD App A

Company Name: Monaco Coach Corporation
Address City IN Zip: 1205 East Lincoln Street, Nappanee, Indiana 46550
County: Elkhart
Permit #: T039-6116
Plant ID: 00087
Reviewer: Melissa Groch

Material	Emission Unit	Density (Lb/Gal)	Weight % Volatile (H2O/Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	lbs VOC per gal. of coating less H2O	lbs VOC per gal. of coating	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
ADHESIVES															
assembly glue	GV48	9.01	56.40%	0.0%	56.4%	0.0%	0.00%	30	1	5.08	5.08	667.73	25.81	ERR	95%
imperial	GV48	9.17	50.00%	0.0%	50.0%	0.0%	0.00%	30	1	4.59	4.59	602.47	30.12	ERR	95%
corian panel	GV42	9.17	45.00%	0.0%	45.0%	0.0%	0.00%	30	1	4.13	4.13	542.22	33.14	ERR	95%
titebond	GV48	9.67	57.70%	0.0%	57.7%	0.0%	0.00%	30	1	5.58	5.58	733.16	26.87	ERR	95%
titebond 50	GV48	9.59	56.10%	0.0%	56.1%	0.0%	0.00%	30	1	5.38	5.38	706.93	27.66	ERR	95%
titeco	GV42	7.76	35.00%	0.0%	35.0%	0.0%	0.00%	30	1	2.72	2.72	356.88	33.14	ERR	95%
CATALYSTS															
catalyst 14-9043	B48, 1-5	8.70	49.00%	0.0%	49.0%	0.0%	0.00%	30	1	4.26	4.26	560.16	145.76	ERR	75%
catalyst L-130	B48, 1-5	8.90	40.95%	0.0%	41.0%	0.0%	0.00%	30	1	3.64	3.64	478.89	172.64	ERR	75%
catalyst 14-9044	B48, 1-5	7.19	83.00%	0.0%	83.0%	0.0%	0.00%	30	1	5.97	5.97	784.16	40.15	ERR	75%
catalyst 14-9048	B48, 1-5	8.20	59.00%	0.0%	59.0%	0.0%	0.00%	30	1	4.84	4.84	635.71	110.44	ERR	75%
COATINGS															
ww super #20	B48, 1-5	7.87	60.40%	0.0%	60.4%	0.0%	0.00%	30	1	4.75	4.75	624.61	102.38	ERR	75%
ww super #30	B48, 1-5	7.95	61.40%	0.0%	61.4%	0.0%	0.00%	30	1	4.88	4.88	641.40	100.81	ERR	75%
ww super #40	B48, 1-5	7.93	61.40%	0.0%	61.4%	0.0%	0.00%	30	1	4.87	4.87	639.79	100.55	ERR	75%
b. maple/amber	B48, 1-5	8.11	52.00%	0.0%	52.0%	0.0%	0.00%	30	1	4.22	4.22	554.14	127.88	ERR	75%
PAINTS															
paint	B48, 1-5	8.77	55.37%	0.0%	55.4%	0.0%	0.00%	30	1	4.86	4.86	638.07	128.58	ERR	75%
yellow rezwood	B48, 1-5	9.38	0.00%	0.0%	0.0%	0.0%	0.00%	30	1	0.00	0.00	0.00	308.13	ERR	75%
featherstone	B48, 1-5	8.61	0.00%	0.0%	0.0%	0.0%	0.00%	30	1	0.00	0.00	0.00	282.84	ERR	75%
forest green	B48, 1-5	8.46	0.00%	0.0%	0.0%	0.0%	0.00%	30	1	0.00	0.00	0.00	277.91	ERR	75%
french vanilla	B48, 1-5	9.70	0.00%	0.0%	0.0%	0.0%	0.00%	30	1	0.00	0.00	0.00	318.65	ERR	75%
full gloss white	B48, 1-5	8.29	0.00%	0.0%	0.0%	0.0%	0.00%	30	1	0.00	0.00	0.00	272.33	ERR	75%
half & half	B48, 1-5	9.68	0.00%	0.0%	0.0%	0.0%	0.00%	30	1	0.00	0.00	0.00	317.99	ERR	75%
innocence	B48, 1-5	8.29	0.00%	0.0%	0.0%	0.0%	0.00%	30	1	0.00	0.00	0.00	272.33	ERR	75%
off white 80	B48, 1-5	9.16	0.00%	0.0%	0.0%	0.0%	0.00%	30	1	0.00	0.00	0.00	300.91	ERR	75%
off white RT-55	B48, 1-5	8.59	0.00%	0.0%	0.0%	0.0%	0.00%	30	1	0.00	0.00	0.00	282.18	ERR	75%
old world	B48, 1-5	9.67	0.00%	0.0%	0.0%	0.0%	0.00%	30	1	0.00	0.00	0.00	317.66	ERR	75%
snow white	B48, 1-5	8.28	0.00%	0.0%	0.0%	0.0%	0.00%	30	1	0.00	0.00	0.00	272.00	ERR	75%
yurek	B48, 1-5	9.34	0.00%	0.0%	0.0%	0.0%	0.00%	30	1	0.00	0.00	0.00	306.82	ERR	75%
odor eliminator	B48, 1-5	7.77	0.00%	0.0%	0.0%	0.0%	0.00%	30	1	0.00	0.00	0.00	255.24	ERR	75%
permatone	B48, 1-5	6.61	0.00%	0.0%	0.0%	0.0%	0.00%	30	1	0.00	0.00	0.00	217.14	ERR	75%
polish furniture	B48, 1-5	10.17	0.00%	0.0%	0.0%	0.0%	0.00%	30	1	0.00	0.00	0.00	334.08	ERR	75%
toluene	B48, 1-5	7.26	0.00%	0.0%	0.0%	0.0%	0.00%	30	1	0.00	0.00	0.00	238.49	ERR	75%
catalyzed primer	B48, 1-5	8.90	0.00%	0.0%	0.0%	0.0%	0.00%	30	1	0.00	0.00	0.00	292.37	ERR	75%
primer 1150	B48, 1-5	9.40	0.00%	0.0%	0.0%	0.0%	0.00%	30	1	0.00	0.00	0.00	308.79	ERR	75%
primer 14-7016	B48, 1-5	9.84	0.00%	0.0%	0.0%	0.0%	0.00%	30	1	0.00	0.00	0.00	323.24	ERR	75%
REDUCERS															
reducer 5350	B48, 1-5	6.80	0.00%	0.0%	0.0%	0.0%	0.00%	30	1	0.00	0.00	0.00	223.38	ERR	75%
graintone	B48, 1-5	6.83	0.00%	0.0%	0.0%	0.0%	0.00%	30	1	0.00	0.00	0.00	224.37	ERR	75%
SEALERS															
silicone	B48, 1-5	8.67	95.00%	0.0%	95.0%	0.0%	0.00%	30	1	8.24	8.24	1082.28	14.24	ERR	75%
sealant topcoat	B48, 1-5	6.25	84.10%	0.0%	84.1%	0.0%	0.00%	30	1	5.26	5.26	690.67	32.64	ERR	75%
sealer 14-7022	B48, 1-5	7.24	67.00%	0.0%	67.0%	0.0%	0.00%	30	1	4.85	4.85	637.40	78.49	ERR	75%
sealer hs chem	B48, 1-5	7.77	69.30%	0.0%	69.3%	0.0%	0.00%	30	1	5.38	5.38	707.54	78.36	ERR	75%
sealer mdf filler	B48, 1-5	8.80	57.11%	0.0%	57.1%	0.0%	0.00%	30	1	5.03	5.03	660.37	123.99	ERR	75%
sealer sanding	B48, 1-5	5.84	99.00%	0.0%	99.0%	0.0%	0.00%	30	1	5.78	5.78	759.70	1.92	ERR	75%
sealer w. white	B48, 1-5	7.39	81.00%	0.0%	81.0%	0.0%	0.00%	30	1	5.99	5.99	786.55	46.12	ERR	75%
semi-gloss	B48, 1-5	5.84	100.00%	0.0%	100.0%	0.0%	0.00%	30	1	5.84	5.84	767.38	0.00	ERR	75%
SOLVENTS															
isopropyl alco.	B48, 1-5	6.55	100.00%	0.0%	100.0%	0.0%	0.00%	30	1	6.55	6.55	860.67	0.00	ERR	75%
lubricant	B48, 1-5	7.01	70.00%	0.0%	70.0%	0.0%	0.00%	30	1	4.91	4.91	644.78	69.08	ERR	75%
mek blend	B48, 1-5	6.71	100.00%	0.0%	100.0%	0.0%	0.00%	30	1	6.71	6.71	881.69	0.00	ERR	75%
thinner	B48, 1-5	7.08	70.00%	0.0%	70.0%	0.0%	0.00%	30	1	4.96	4.96	651.22	69.77	ERR	75%
thinner wash	B48, 1-5	6.87	100.00%	0.0%	100.0%	0.0%	0.00%	30	1	6.87	6.87	902.72	0.00	ERR	75%
xytol	B48, 1-5	7.25	100.00%	0.0%	100.0%	0.0%	0.00%	30	1	7.25	7.25	952.65	0.00	ERR	75%
STAINS															
aged maple	B48, 1-5	7.81	80.00%	0.0%	80.0%	0.0%	0.00%	30	1	6.25	6.25	820.99	51.31	ERR	75%
autumn haze	B48, 1-5	7.29	60.00%	0.0%	60.0%	0.0%	0.00%	30	1	4.37	4.37	574.74	95.79	ERR	75%
burnt sugar	B48, 1-5	9.03	52.00%	0.0%	52.0%	0.0%	0.00%	30	1	4.70	4.70	617.00	142.39	ERR	75%
danish graintone	B48, 1-5	7.73	78.00%	0.0%	78.0%	0.0%	0.00%	30	1	6.03	6.03	792.26	55.86	ERR	75%
dark cherry	B48, 1-5	8.34	58.00%	0.0%	58.0%	0.0%	0.00%	30	1	4.84	4.84	635.61	115.07	ERR	75%
early american	B48, 1-5	7.76	79.00%	0.0%	79.0%	0.0%	0.00%	30	1	6.13	6.13	805.53	53.53	ERR	75%
gt wiping base	B48, 1-5	7.02	93.00%	0.0%	93.0%	0.0%	0.00%	30	1	6.53	6.53	857.86	16.14	ERR	75%
holiday beige	B48, 1-5	6.92	95.00%	0.0%	95.0%	0.0%	0.00%	30	1	6.57	6.57	863.82	11.37	ERR	75%
honey	B48, 1-5	7.28	96.00%	0.0%	96.0%	0.0%	0.00%	30	1	6.99	6.99	918.33	9.57	ERR	75%
italian	B48, 1-5	7.89	72.00%	0.0%	72.0%	0.0%	0.00%	30	1	5.68	5.68	746.46	72.57	ERR	75%
late harvest	B48, 1-5	8.13	67.00%	0.0%	67.0%	0.0%	0.00%	30	1	5.45	5.45	715.75	88.13	ERR	75%
marlot	B48, 1-5	7.02	91.00%	0.0%	91.0%	0.0%	0.00%	30	1	6.39	6.39	839.41	20.75	ERR	75%
natural	B48, 1-5	?	97.00%	0.0%	97.0%	0.0%	0.00%	30	1	0.00	0.00	0.00	0.00	ERR	75%
new carmel	B48, 1-5	7.75	78.00%	0.0%	78.0%	0.0%	0.00%	30	1	6.05	6.05	794.31	56.01	ERR	75%
roseau	B48, 1-5	7.39	79.00%	0.0%	79.0%	0.0%	0.00%	30	1	5.84	5.84	767.13	50.98	ERR	75%
sheffield gtws	B48, 1-5	7.60	80.00%	0.0%	80.0%	0.0%	0.00%	30	1	6.08	6.08	798.91	49.93	ERR	75%
antique spice	B48, 1-5	7.77	83.00%	0.0%	83.0%	0.0%	0.00%	30	1	6.45	6.45	847.41	43.39	ERR	75%
tawny beige	B48, 1-5	7.04	92.00%	0.0%	92.0%	0.0%	0.00%	30	1	6.48	6.48	851.05	18.50	ERR	75%
white glaze	B48, 1-5	10.39	35.00%	0.0%	35.0%	0.0%	0.00%	30	1	3.64	3.64	477.84	221.85	ERR	75%
white graintone	B48, 1-5	8.26	77.00%	0.0%	77.0%	0.0%	0.00%	30	1	6.36	6.36	835.73	62.41	ERR	75%
white gtws oak	B48, 1-5	8.18	76.00%	0.0%	76.0%	0.0%	0.00%	30	1	6.22	6.22	816.89	64.49	ERR	75%
stripper/chem	B48, 1-5	10.10	98.70%	0.0%	98.7%	0.0%	0.00%	30	1	9.97	9.97	1309.89	4.31	ERR	75%

State Potential Emissions

Add worst case coating to all solvents

4648.44

495.14

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Pot

HAP Emission Calculations

Page 2 of 6 TSD AppA

Company Name: Monaco Coach Corporation
Plant Location: 1205 East Lincoln Street, Nappanee, Indiana 46550
County: Elkhart
Permit #: T039-6116
Plant ID: 00087

Permit Reviewer: Melissa Groch

Material	Emission Unit	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl- Chlor	Weight % Phenol	Weight % Formaldehyde	Weight % Methanol	Weight % MEK	Weight % MEK	Weight % Cumene	Weight % Ethyl Benzene	Weight % DEHP	Weight % Vinyl Acetate	EMISSIONS (lb/yr)										TOTAL HAPS	
																	Xylene	Toluene	Methylene- Chloride	Phenol	Formal- dehyde	Methanol	MEK	MEK	Cumene	Ethyl Benzene		DEHP
ADHESIVES																												
assembly glue	GV48, 42	9.01	30	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
imperial	GV48, 42	9.17	30	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
corian panel	GV42	9.17	30	1	0.00%	19.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	228.94	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	228.94
itebond	GV48, 42	9.67	30	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
itebond 50	GV48, 42	9.59	30	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
iteco	GV42	7.76	30	1	0.00%	0.00%	50.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	509.83	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	509.83
CATALYSTS																												
catalyst 14-9043	B48, 1-5	8.70	30	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
catalyst L-130	B48, 1-5	8.90	30	1	0.00%	0.00%	0.00%	2.36%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	27.60	0.00	0.00	0.00	0.00	0.00	0.00	0.00	27.60
catalyst 14-9044	B48, 1-5	7.19	30	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
catalyst 14-9048	B48, 1-5	8.20	30	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
COATINGS																												
vw super #20	B48, 1-5	7.87	30	1	25.00%	18.00%	0.00%	0.00%	0.20%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	258.53	186.14	0.00	0.00	2.07	51.71	0.00	0.00	0.00	0.00	0.00	498.44
vw super #30	B48, 1-5	7.95	30	1	17.00%	29.00%	0.00%	0.00%	0.40%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	177.59	302.94	0.00	0.00	4.18	0.00	0.00	0.00	0.00	0.00	0.00	484.71
vw super #40	B48, 1-5	7.93	30	1	17.00%	29.00%	0.00%	0.00%	0.40%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	177.14	302.16	0.00	0.00	4.17	0.00	0.00	0.00	0.00	0.00	0.00	483.49
b. maple/lambr	B48, 1-5	8.11	30	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PAINTS																												
paint	B48, 1-5	8.77	30	1	0.00%	16.78%	0.00%	0.00%	0.39%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	193.37	0.00	0.00	4.49	0.00	0.00	0.00	0.00	0.00	0.00	197.86
yellow redwood	B48, 1-5	9.38	30	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6.16
featherstone	B48, 1-5	8.61	30	1	0.00%	0.00%	0.00%	0.00%	0.40%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	4.53	0.00	0.00	0.00	0.00	0.00	0.00	4.53
forest green	B48, 1-5	8.46	30	1	21.06%	11.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	234.11	122.39	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	356.50
french vanilla	B48, 1-5	9.70	30	1	32.20%	0.00%	0.00%	0.00%	0.40%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	410.41	0.00	0.00	0.00	5.10	0.00	0.00	0.00	0.00	0.00	0.00	415.51
full gloss white	B48, 1-5	8.29	30	1	16.19%	18.53%	0.00%	0.00%	0.43%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	176.36	201.85	0.00	0.00	4.68	0.00	0.00	0.00	0.00	0.00	0.00	382.89
half & half	B48, 1-5	9.68	30	1	32.31%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	410.97	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	410.97
innocence	B48, 1-5	8.29	30	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
off white 80	B48, 1-5	9.16	30	1	7.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	84.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	84.25
off white RT-55	B48, 1-5	8.59	30	1	15.09%	17.28%	0.00%	0.00%	0.40%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	170.32	195.04	0.00	0.00	4.51	0.00	0.00	0.00	0.00	0.00	0.00	369.88
old world	B48, 1-5	9.67	30	1	32.30%	0.00%	0.00%	0.00%	0.40%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	410.42	0.00	0.00	0.00	5.08	0.00	0.00	0.00	0.00	0.00	0.00	415.50
snow white	B48, 1-5	8.28	30	1	16.48%	18.87%	0.00%	0.00%	0.43%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	179.30	205.30	0.00	0.00	4.68	0.00	0.00	0.00	0.00	0.00	0.00	389.28
yurek	B48, 1-5	9.34	30	1	0.00%	13.50%	0.00%	0.00%	0.39%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	165.68	0.00	0.00	4.79	0.00	0.00	0.00	0.00	0.00	0.00	170.47
odor eliminator	B48, 1-5	7.77	30	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
permatone	B48, 1-5	6.81	30	1	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	888.55	0.00	0.00	0.00	0.00	0.00	888.55
polish furniture	B48, 1-5	10.17	30	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
toluene	B48, 1-5	7.26	30	1	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	953.96	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	953.96
catalyzed primer	B48, 1-5	8.90	30	1	14.79%	13.55%	0.00%	0.00%	0.16%	0.00%	12.40%	0.00%	0.00%	0.00%	0.00%	0.00%	172.96	158.46	0.00	0.00	1.97	0.00	145.01	0.00	0.00	0.00	0.00	478.31
primer 1150	B48, 1-5	9.40	30	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
primer 14-7016	B48, 1-5	9.84	30	1	13.00%	15.00%	0.00%	0.00%	0.10%	0.00%	8.00%	5.00%	0.00%	0.00%	0.00%	0.00%	168.09	193.95	0.00	0.00	1.29	0.00	103.44	64.65	0.00	0.00	0.00	531.41
REDUCERS																												
reducer 5350	B48, 1-5	6.80	30	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	29.64%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	264.84	0.00	0.00	0.00	0.00	0.00	264.84
graintone	B48, 1-5	6.83	30	1	33.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.00%	0.00%	0.00%	0.00%	296.16	17.95	0.00	0.00	0.00	0.00	0.00	17.95	0.00	0.00	0.00	332.06

Subtotal: 3326.62 3428.16 509.83 27.60 51.44 920.26 513.29 64.65 17.95 0.00 0.00 6.16

HAP Emission Calculations (Continued)

Company Name: Monaco Coach Corporation
 Plant Location: 1205 East Lincoln Street, Nappanee, Indiana 46550
 County: Elkhart
 Permit #: T039-6116
 Plant ID: 00087
 Permit Reviewer: Melissa Groch

Material	Emission Unit	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Chlor.	Weight % Phenol	Weight % Formaldehyde	Weight % Methanol	Weight % MIBK	Weight % MEK	Weight % Cumene	Weight % Ethyl Benzene	Weight % DEHP	Weight % Vinyl Acetate	EMISSIONS (ton/yr)											TOTAL HAPS												
																	Xylene	Toluene	Methylene Chloride	Phenol	Formal- dehyde	Methanol	MIBK	MEK	Cumene	Ethyl Benzene	DEHP		Vinyl Acetate											
SEALERS																																								
silicone	B48, 1-5	8.67	30	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00										
sealant topcoat	B48, 1-5	6.25	30	1	1.40%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.30%	0.00%	0.00%	11.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.68	0.00	0.00	22.17										
sealer 14-7022	B48, 1-5	7.24	30	1	10.00%	19.00%	0.00%	0.00%	0.00%	0.00%	23.00%	0.00%	0.00%	0.00%	0.00%	0.00%	95.13	180.75	0.00	0.00	0.00	0.00	0.00	218.81	0.00	0.00	0.00	0.00	0.00	494.69										
sealer hs chem	B48, 1-5	7.77	30	1	24.00%	16.00%	0.00%	0.00%	0.30%	0.00%	8.00%	0.00%	0.00%	0.00%	0.00%	0.00%	245.03	163.36	0.00	0.00	3.06	0.00	81.68	0.00	0.00	0.00	0.00	0.00	0.00	493.13										
sealer mdf filler	B48, 1-5	8.80	30	1	3.89%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	28.19%	0.00%	0.00%	0.00%	0.00%	44.98	0.00	0.00	0.00	0.00	0.00	0.00	325.97	0.00	0.00	0.00	0.00	0.00	370.95										
sealer sanding	B48, 1-5	5.84	30	1	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	5.00%	5.00%	0.00%	0.00%	5.00%	0.00%	0.00	153.48	0.00	0.00	0.00	0.00	0.00	38.37	38.37	0.00	0.00	38.37	0.00	268.58										
sealer w. white	B48, 1-5	7.39	30	1	13.00%	18.00%	0.00%	0.00%	0.00%	0.00%	5.00%	5.00%	0.00%	0.00%	0.00%	0.00%	126.24	174.79	0.00	0.00	0.00	0.00	0.00	48.55	48.55	0.00	0.00	0.00	0.00	398.13										
semi-gloss	B48, 1-5	5.84	30	1	0.00%	25.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%	0.00%	0.00	191.84	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	38.37	0.00	0.00	230.21										
SOLVENTS																																								
isopropyl alco.	B48, 1-5	6.55	30	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00										
lubricant	B48, 1-5	7.01	30	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00										
mek blend	B48, 1-5	6.71	30	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	881.69	0.00	0.00	0.00	0.00	0.00	881.69									
thinner	B48, 1-5	7.08	30	1	10.00%	70.00%	0.00%	0.00%	0.00%	10.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	93.03	651.22	0.00	0.00	0.00	93.03	93.03	0.00	0.00	0.00	0.00	0.00	0.00	930.31										
thinner wash	B48, 1-5	6.87	30	1	0.00%	40.00%	0.00%	0.00%	0.00%	0.00%	10.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00	361.09	0.00	0.00	0.00	0.00	0.00	90.27	90.27	0.00	0.00	0.00	0.00	541.63										
xytol	B48, 1-5	7.25	30	1	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	952.65	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	952.65										
STAINS																																								
aged maple	B48, 1-5	7.81	30	1	4.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	41.05	20.52	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	61.57										
autumn haze	B48, 1-5	7.29	30	1	19.00%	4.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.00%	0.00%	0.00%	182.00	38.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	38.32	0.00	0.00	258.63										
burnt sugar	B48, 1-5	9.03	30	1	5.00%	16.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	59.33	189.85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	249.17										
danish graintone	B48, 1-5	7.73	30	1	13.00%	7.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	132.04	71.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	203.14										
dark cherry	B48, 1-5	8.34	30	1	20.00%	6.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	219.18	65.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	284.93										
early american	B48, 1-5	7.76	30	1	7.00%	4.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	71.38	40.79	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112.16										
gt wiping base	B48, 1-5	7.02	30	1	27.00%	6.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	249.06	55.35	0.00	0.00	0.00	0.00	0.00	0.00	9.22	0.00	0.00	0.00	0.00	313.63										
holiday beige	B48, 1-5	6.92	30	1	31.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	281.88	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	281.88										
honey	B48, 1-5	7.28	30	1	19.00%	74.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	181.75	707.88	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	889.63										
italian	B48, 1-5	7.89	30	1	10.00%	7.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	103.67	72.57	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	176.25										
late harvest	B48, 1-5	8.13	30	1	22.00%	9.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	235.02	96.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	331.17										
marlot	B48, 1-5	7.02	30	1	27.00%	4.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.00%	0.00%	249.06	36.90	0.00	0.00	0.00	0.00	0.00	0.00	9.22	0.00	0.00	0.00	0.00	295.18										
natural	B48, 1-5	?	30	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00										
new camel	B48, 1-5	7.75	30	1	11.00%	6.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	112.02	61.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	173.12										
roseau	B48, 1-5	7.39	30	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00										
sheffield gtw	B48, 1-5	7.60	30	1	27.00%	5.00%	0.00%	0.00%	0.00%	0.00%	2.00%	5.00%	0.00%	0.00%	0.00%	0.00%	269.63	49.93	0.00	0.00	0.00	19.97	49.93	0.00	0.00	0.00	0.00	0.00	0.00	389.47										
antique spice	B48, 1-5	7.77	30	1	5.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	51.05	20.42	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	71.47										
tawny beige	B48, 1-5	7.04	30	1	31.00%	3.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.00%	0.00%	286.77	27.75	0.00	0.00	0.00	0.00	0.00	0.00	9.25	0.00	0.00	0.00	0.00	323.77										
white glaze	B48, 1-5	10.39	30	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00										
white graintone	B48, 1-5	8.26	30	1	8.00%	58.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	86.83	629.51	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	716.34										
white gtw oak	B48, 1-5	8.18	30	1	4.00%	63.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	42.99	677.16	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	720.15										
stripper/chem	B48, 1-5	10.10	30	1	0.00%	0.00%	86.70%	0.00%	0.00%	7.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	1150.63	0.00	0.00	92.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1243.53										
TOTAL EMISSIONS OF SOLVENTS:					3306.29													TOTAL EMISSIONS:											7749.89	8165.73	1660.46	27.60	54.51	1126.16	1133.93	1449.50	45.65	48.99	76.74	6.16

**Appendix A: Emissions Calculations
Woodworking Emissions**

Company Name: Monaco Coach Corporation
Address City IN Zip: 1205 East Lincoln Street, Nappanee, Indiana 46550
County: Elkhart
Permit #: T039-6116
Plant ID: 00087
Reviewer: Melissa Groch

Potential Emissions

	<u>D48-01</u>	<u>D48-02 and D42-01</u>
PM control equipment:	Baghouse	Cyclones
Throughput of Wood:	10000 Lbs/hr	2000 Lbs/hr
Grain Loading (outlet):	0.01 grains/acf	0.02 grains/acf
Air Flow rate:	42000 acfm	4600 acfm
Control Efficiency:	99%	95%

After Control Emissions:

	<u>D48-01</u>	<u>D48-02 and D42-01</u>
Emissions: (gr/acf)(acf/min)(60 min/hr)(lb/7000 gr) =	3.60 lb/hr	0.79 lb/hr
(lb/hr)(ton/2000 lb)(8760 hrs/yr) =	15.77 tons/yr	3.45 tons/yr

Before Control Emissions:

Emissions: (tons/yr) / (1-control efficiency) =	360.0 lb/hr	15.8 lb/hr
	1576.8 tons/yr	69.1 tons/yr

Allowable Emissions

Wood throughput: (lbs wood/hr)(ton/2000 lb) =	5 tons/hr	1 tons/hr
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326 IAC 6-3-2 (Process Operations - Particulate emissions limitations)

$E = 4.10 P^{0.67}$ Where E= emissions in lbs/hr
P= process weight rate in tons/hr

$E = (4.10)(\text{wood throughput})^{0.67}$
= 12.05 lbs/hr for D48-01
= 4.10 lbs/hr for D48-02 and D42-01

Since 3.6 and 0.79 pounds per hour are less than the allowable emission rates of 12.05 and 4.10 pounds per hour respectively, the woodworking operations are in compliance with 326 IAC 6-3-2.

Appendix A: Emissions Calculations
Fiberglass Emissions Calculations
(from CP 039-10299, issued 2/5/99)

Page 5 of 6 TSD App A

Company Name: Monaco Coach Corporation
Address City IN Zip: 1205 East Lincoln Street, Nappanee, Indiana 46550
County: Elkhart
Permit #: T039-6116
Plant ID: 00087
Reviewer: Melissa Groch

Potential VOC emissions:

(1) Resin potential VOC/styrene emissions = $(100 \text{ lb/hr} * 0.036 \text{ (CFA emission loss)}) + 7.5 \text{ lb/hr} *$
 $* 0.07 \text{ (CFA emission loss)} = 4.125 \text{ lb/hr}; 4.125 \text{ lb/hr} * 8760 \text{ hr/yr} * \text{ton}/2000 \text{ lb} = 18.07 \text{ ton /yr}$

(2) Gel Coat potential VOC/styrene emissions = $31 \text{ lb/hr} * 0.188 \text{ (CFA emission loss)} = 5.83 \text{ lb/hr} ;$
 $5.83 \text{ lb/hr} * 8760 \text{ hr/yr} * \text{ton}/2000 \text{ lb} = 25.5 \text{ ton/yr}$

(3) Catalyst potential VOC emissions = $3.25 \text{ lb/hr} * 0.44 \text{ (percent VOC)} = 1.43 \text{ lb/hr};$
 $1.43 \text{ lb/hr} * 8760 \text{ hr/yr} * \text{ton}/2000 \text{ lb} = 6.26 \text{ ton/yr}$

(3) Wax/Mold Release potential VOC emissions = $0.421 \text{ lb/hr}; 0.421 \text{ lb/hr} * 8760 \text{ hr/yr} * \text{ton}/2000 \text{ lb} = 1.84 \text{ ton/yr}$

Total potential VOC emissions = 51.67 ton/yr

Total potential styrene emissions = 43.57 ton/yr

Potential PM/PM10 emissions:

(1) Routers and Grinder PM/PM10 emissions = $1.0 \text{ lb/hr collected (estimated) } / 0.95 \text{ (efficiency)} = 1.05 \text{ lb/hr potential};$
 $1.05 \text{ lb/hr} * 8760 \text{ hr/yr} * \text{ton}/2000 \text{ lb} = 4.61 \text{ ton/yr}$

(2) Fiberglass PM/PM10 emissions = $1.89 \text{ tons per year (source's estimated actual emissions)} * 8760 \text{ hr}/2000 \text{ hr (actual)} =$
 8.27 ton/yr

Total PM/PM10 emissions = 12.88 tons per year.

Natural Gas Combustion Only

MM BTU/HR <100

Space Heaters and Air Make-up Units

Company Name: Monaco Coach Corporation
Address City IN Zip: 1205 East Lincoln Street, Nappanee, Indiana 46550
County: Elkhart
Permit #: T039-6116
Plant ID: 00087
Reviewer: Melissa Groch

Heat Input Capacity MMBtu/hr	Total Potential Throughput MMCF/yr
3 space heaters @ 0.06	0.53
8 space heaters @ 0.16	1.40
1 space heaters @ 0.20	1.75
17 space heaters @ 0.10	0.88
2 furnaces @ 0.15	1.31
1 air make-up unit @ 4.30	37.67
1 air make-up unit @ 4.80	42.05

Emission Factor in lb/MMCF	Pollutant					
	PM 7.6	PM10 7.6	SO2 0.6	NOx 100.0 (see below)	VOC 5.5	CO 84.0
Potential Emission in tons/yr						
1 space heater @ 0.06	0.002	0.002	0.000	0.026	0.001	0.022
total 3	0.006	0.006	0.000	0.079	0.004	0.066
1 space heater @ 0.16	0.005	0.005	0.000	0.070	0.004	0.059
total 8	0.043	0.043	0.003	0.561	0.031	0.471
1 space heater @ 0.20	0.007	0.007	0.001	0.088	0.005	0.074
1 space heater @ 0.10	0.003	0.003	0.000	0.044	0.002	0.037
total 17	0.057	0.057	0.004	0.745	0.041	0.625
1 furnace @ 0.15	0.005	0.005	0.000	0.066	0.004	0.055
total 2	0.010	0.010	0.001	0.131	0.007	0.110
1 air make-up unit @ 4.30	0.143	0.143	0.011	1.883	0.104	1.582
1 air make-up unit @ 4.80	0.160	0.160	0.013	2.102	0.116	1.766
Total:	0.425	0.425	0.034	5.589	0.307	4.695

Methodology:

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

PM emission factors are condensable and filterable.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton